

Golden State Resource, LLC

2700 South Indiana Street Vernon
California 90023

CAD 097854541

Phone: 651-454-3310

February 22, 1999

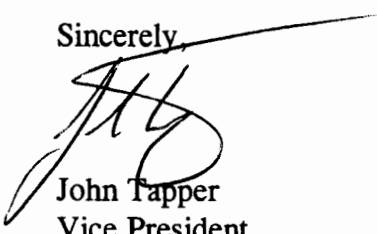
EPA Region 9
Hazardous Waste Management Division
75 Hawthorne Street
H-3-4
San Francisco, California 94105

Re: Change of Ownership of the GNB Technologies facility in Vernon, California

This letter is to inform you that Golden State Resource, LLC will be acquiring the GNB Technologies Inc. facility in Vernon, California. Please note that this replaces a previous letter which identified the buyer's name as California Resources, LLC. This renaming was necessary because of a name conflict with another business already registered to do business in the state.

As required under California Rule 66270.72 in Title 22 of the California Code of Regulations, a new Part A Application identifying the new owner/operator is attached to this letter. This transaction is expected to close in late March or early April 1999. Please let me know if you require any more documentation at this point in the transition. I can be reached by phone at (651) 454-3310.

Sincerely,



John Tapper
Vice President

cc: José Kou, P.E., Chief
Southern California Permitting Branch
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, California 91201-2205

For EPA Regional Use Only		<h1>EPA</h1> <p>United States Environmental Protection Agency Washington, DC 20460</p> <h2>Hazardous Waste Permit Application</h2> <h3>Part A</h3> <p>(Read the Instructions before starting)</p>				
Date Received						
Month	Day			Year		
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)						
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment # 7			
C. Installation's EPA ID Number			D. Secondary ID Number (If applicable)			
CAD097854541						
II. Name of Facility						
GOLDEN STATE RESOURCE, LLC						
III. Facility Location (Physical address not P.O. Box or Route Number)						
A. Street						
2700 SOUTH INDIANA STREET						
Street (Continued)						
City or Town				State	Zip Code	
VERNON				CA	90023	
County Code (If known)	County Name					
	LOS ANGELES					
B. Land Type	C. Geographic Location			D. Facility Existence Date		
(Enter code)	LATITUDE (Degrees, Minutes, & Seconds) LONGITUDE (Degrees, Minutes & Seconds)			Month Day Year		
P	34, 00, 22 118, 11, 48			1922		
IV. Facility Mailing Address						
Street or P.O. Box						
P.O. BOX 23957						
City or Town				State	Zip Code	
LOS ANGELES				CA	90023-1101	
V. Facility Contact (Person to be contacted regarding waste activities at facility)						
Name (Last)			(First)			
MARZOLINO			JAMES			
Job Title			Phone Number (Area Code and Number)			
ENVIRONMENTAL MANAGER			323-262-1101 x259			
VI. Facility Contact Address (See instructions)						
A. Contact Address		B. Street or P.O. Box				
Location	Mailing	Other				
X						
City or Town				State	Zip Code	

EPA I.D. Number (Enter from page 1)		Secondary ID Number (Enter from page 1)	
CAD097854541			
VII. Operator Information (See Instructions)			
Name of Operator			
GOLDEN STATE RESOURCE LLC			
Street or P.O. Box			
2700 SOUTH INDIANA STREET			
City or Town		State	ZIP Code
VERNON		CA	90023
Phone Number (Area Code and Number)		B. Operator Type	C. Change of Operator Indicator
323-262-1101		P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
VIII. Facility Owner (See Instructions)			
A. Name of Facility's Legal Owner			
GOLDEN STATE RESOURCE LLC			
Street or P.O. Box			
2700 SOUTH INDIANA STREET			
City or Town		State	ZIP Code
VERNON		CA	90023
Phone Number (Area Code and Number)		B. Owner Type	C. Change of Owner Indicator
323-262-1101		P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
IX. SIC Codes (4-digit, in order of significance)			
Primary		Secondary	
3341	(Description) LEAD SMELTING & REFINING,	SECONDARY	(Description)
Secondary		Secondary	
	(Description)		(Description)
X. Other Environmental Permits (See instructions)			
A. Permit Type (Enter code)	B. Permit Number	C. Description	
E	044551 SCAQMD PERMIT	FACILITY PERMIT TO OPERATE	
E	0202 CITY OF VERNON HEALTH PERMIT	WASTE PROCESSING FACILITY	
E	6244 CITY OF VERNON HEALTH PERMIT	HAZARDOUS MATERIALS CLASS C	
E	11092R-1 INDUSTRIAL WASTEWATER	L.A. COUNTY SANITATION DISTRICT	
	DISCHARGE REGISTRATION NUMBER		

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

CAD097854541

XI. Nature of Business (Provide a brief description)

SEE ATTACHMENT A

XII. Process Codes and Design Capacities

- A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.
- B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.
1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	<u>Disposal:</u> Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor	
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T90	Pulping Liquor Recovery Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces	
S01	<u>Storage:</u> Container (Barrel, Drum, Etc.)	Gallons or Liters	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	Cubic Yards or Cubic Meters
S02	Tank	Gallons or Liters	T94	Containment Building-Treatment	
S03	Waste Pile	Cubic Yards or Cubic Meters	<u>Miscellaneous (Subpart X):</u>		Any Unit of Measure Listed Below
S04	Surface Impoundment	Gallons or Liters	X01	Open Burning/Open Detonation	
S05	Drip Pad	Gallons or Liters	X02	Mechanical Processing	
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	X03	Thermal Unit	
S99	Other Storage	Any Unit of Measure Listed Below	X04	Geologic Repository	Cubic Yards or Cubic Meters
T01	<u>Treatment:</u> Tank	Gallons Per Day or Liters Per Day	X99	Other Subpart X	
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			Any Unit of Measure Listed Below
T03	Inclinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boiler	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T82	Lime Kiln	Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	I

EPA I.D. Number (Enter from page 1)						Secondary ID Number (Enter from page 1)					
CAD097854541											
XII. Process Codes and Design Capabilities (Continued)											
<i>EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.</i>											
Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>					
X 1	S	0	2		533.788	G	001				
1	S	0	1		180.060	G	001				
2	S	0	1		39.250	G	001				
3	S	0	1		18.530	G	001				
4	S	0	1		77.712	G	001				
5	S	0	2		1.683	G	001				
6	S	0	2		1.615	G	001				
7	T	0	1		310.000	U	001				
8	T	0	1		310.000	U	001				
9	T	0	1		310.000	U	001				
10	S	0	2		13.535	G	001				
11	S	0	2		11.844	G	001				
12	T	0	1		310.000	U	001				
13	T	0	1		310.000	U	001				
NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.											
XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)											
Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process			
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>					
X 1	T	0	4					In-situ Vitrification			
1											
2											
3											
4											
1											
2											
3											

ADDITIONAL SHEET FOR ITEM XII

Line Number		A. Process Code			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only					
					1. Amount	2. Unit Of Measure							
1	4	S	0	2	3.209	G	001						
1	5	S	0	2	47.378	G	001						
1	6	T	0	1	310.000	U	001						
1	7	T	0	1	310.000	U	001						
1	8	S	0	2	3.008	G	001						
1	9	S	0	2	8.589	G	001						
2	0	T	0	1	310.000	U	001						
2	1	T	0	1	310.000	U	001						
2	2	S	0	2	39.020	G	001						
2	3	S	0	2	39.020	G	001						
2	4	T	0	1	43.200	U	001						
2	5	T	0	1	43.200	U	001						
2	6	T	0	1	310.000	U	001						
2	7	T	0	1	310.000	U	001						
2	8	T	0	1	310.000	U	001						
2	9	T	0	1	310.000	U	001						
3	0	S	0	2	34.591	G	001						
3	1	S	0	2	1.600	G	001						
3	2	S	0	2	1.600	G	001						
3	3	S	0	6	4.379,6	Y	001						
3	4	S	0	6	- 1.486	Y	001						
3	5	S	0	2	3.321	G	001						
3	6	X	0	3	450	N	001						
3	7	X	0	3	250	N	001						
3	8	S	0	2	479	G	001						
3	9	S	0	2	202	G	001						
4	0	X	0	2	53	D	001						
4	1	T	0	1	1.440	U	001						
4	2	X	0	2	310.000	U	001						
4	3	X	0	2	310.000	U	001						
4	4	X	0	2	310.000	U	001						
4	5	X	0	2	310.000	U	001						

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
CAD097854541	

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS									
								(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X 1	K	0	5	4		900	P	T	0	3	D	8	0				
X 2	D	0	0	2		400	P	T	0	3	D	8	0				
X 3	D	0	0	1		100	P	T	0	3	D	8	0				
X 4	D	0	0	2													Included With Above

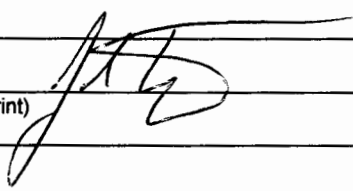
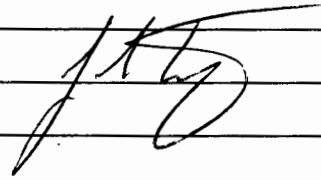
EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

CAD097854541

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))					
1	K 0 6 9	2,160	T	S	0	2	T	0	1	S	0	6	X03		
2	SPENT LEAD-ACID BATTERIES:														
3	D 0 0 8	200,000	T	S	0	1	T	0	1	S	0	2	S06, X03		
4	D 0 0 2	INCLUDED	ABOVE												
5	D 0 0 4	INCLUDED	ABOVE												
6	D 0 0 6	INCLUDED	ABOVE												
7	BATTERY MANUFACTURING PLANT SCRAP:														
8	D 0 0 8	15,000	T	S	0	1	S	0	6	X	0	3			
9	D 0 0 4	INCLUDED	ABOVE												
10	D 0 0 6	INCLUDED	ABOVE												
11	D 0 0 2	INCLUDED	ABOVE												
12	WASTEWATER:														
13	D 0 0 8	160,475	T	S	0	2	T	0	1						
14	WASTEWATER SLUDGE:														
15	D 0 0 8	2,040	T	S	0	2	S	0	6	X	0	3			
16	D 0 0 4	INCLUDED	ABOVE												
17	D 0 0 6	INCLUDED	ABOVE												
18															
19															
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33															

EPA I.D. Number (Enter from page 1) CAD097854541	Secondary ID Number (Enter from page 1)
XV. Map <i>Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</i>	
XVI. Facility Drawing <i>All existing facilities must include a scale drawing of the facility (see instructions for more detail).</i>	
XVII. Photographs <i>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).</i>	
XVIII. Certification(s) <i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
Owner Signature 	Date Signed 2/22/99
Name and Official Title (Type or print) JOHN TAPPER VICE PRESIDENT	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature 	Date Signed 2/22/99
Name and Official Title (Type or print) JOHN TAPPER VICE PRESIDENT	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
XIX. Comments	
ATTACHMENT B - FACILITY DRAWING	
ATTACHMENT C - REGULATED UNIT DESCRIPTIONS	
ATTACHMENT D - SOLID WASTE MANAGEMENT UNIT SUMMARY	
ATTACHMENT E - CERTIFICATION & SIGNATURE	
Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)	

ATTACHMENT A

ATTACHMENT A

Item XI of the Part A Application —

The Nature of the Business of Lead-Acid Battery Reclamation

The life cycle of a battery begins with its construction at the manufacturing plant, followed by the purchase and use of the battery for electrical ignition. The average life of an automotive battery is approximately three years. Once the battery can no longer hold a charge, the "dead," "spent," or "junk" battery is typically returned to the retailer at the time of replacement purchase. The retailer may accumulate a trailer load before either shipping the batteries back to a manufacturer's collection point, scrap dealer, or directly to a secondary lead plant (battery recycling plant). Batteries are stored at a secondary lead recycling plant before being separated into their constituent parts. The lead smelted and recovered from the spent batteries is primarily used at a battery manufacturing plant to produce new batteries. The plastic battery case material is also reclaimed and used to produce new battery cases.

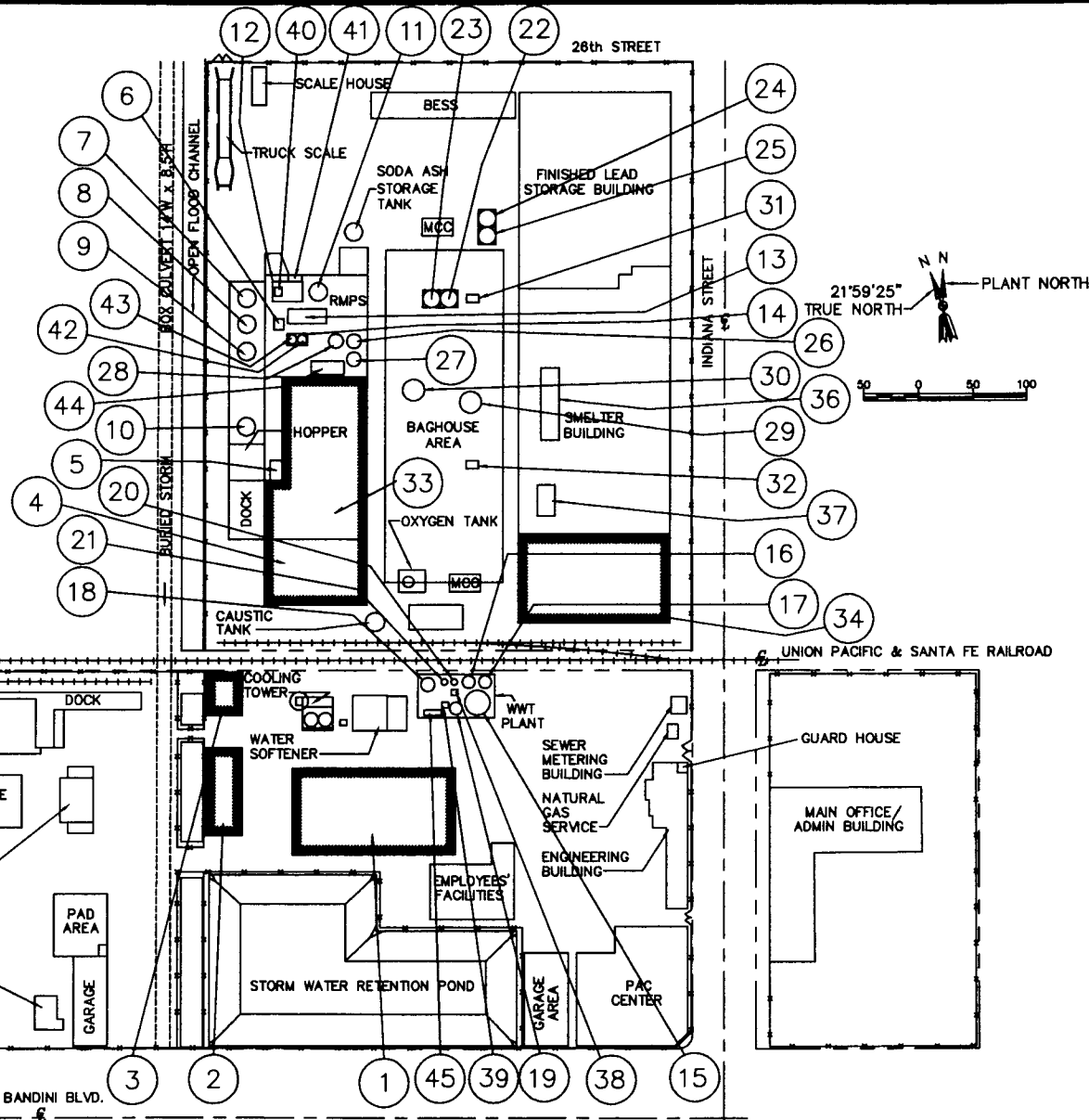
Due to a drop in lead prices and an increase in the cost of production, less than half of the secondary lead recyclers in the United States in business in 1980 are still operating today. However, the number of used batteries being generated has increased with population growth and will continue to do so with the increased use of electric vehicles.

The resource recycling plant in Vernon, California has an average production of 100,000 tons of lead per year with a maximum production capacity of 215,000 tons per year. This maximum production capacity is equivalent to recycling approximately 19.5 million automotive batteries per year. The plant also recycles lead bearing plant scrap, primarily from lead-acid battery manufacturers.

ATTACHMENT B

LEGEND

- | | |
|--|---|
| <p>1 Central Container Receiving Building</p> <p>2 West Container Receiving Building #1</p> <p>3 West Container Receiving Building #2</p> <p>4 Canopied Container Receiving Building</p> <p>5 Battery Dump Bin Sump</p> <p>6 RMPS Floor Sump</p> <p>7 North Mud Tank</p> <p>8 Center Mud Tank</p> <p>9 South Mud Tank</p> <p>10 Acid Storage Tank</p> <p>11 Overflow Tank</p> <p>12 Paste Thickening Unit (Santa Maria)</p> <p>13 Sink/Float Separator</p> <p>14 Recycle Tank</p> <p>15 50K Tank</p> <p>16 West Reaction Tank</p> <p>17 East Reaction Tank</p> <p>18 Pump Tank</p> <p>19 Sludge Tank</p> <p>20 Delta Stack Flocculation</p> <p>21 Delta Stack Clarifier</p> <p>22 East Equalization Tank</p> | <p>23 West Equalization Tank</p> <p>24 North Oxidation Tank</p> <p>25 South Oxidation Tank</p> <p>26 pH Adjustment Tank #1</p> <p>27 pH Adjustment Tank #2</p> <p>28 pH Adjustment Tank #3</p> <p>29 Process Tank</p> <p>30 Filtrate Tank</p> <p>31 North Flue Dust Slurry Sump</p> <p>32 South Flue Dust Slurry Sump</p> <p>33 Reverb Furnace Feed Room</p> <p>34 Blast Furnace Feed Room</p> <p>35 Mobile Equipment Wash Sump</p> <p>36 Reverb Furnace</p> <p>37 Blast Furnace</p> <p>38 WWTP Area Sump</p> <p>39 WWTP Filter Press Sump</p> <p>40 RMPS Hammer Mill</p> <p>41 Waste Acid Circulation Tank</p> <p>42 East Elutriation Column</p> <p>43 West Elutriation Column</p> <p>44 RMPS Filter Press</p> <p>45 WWTP Filter Press</p> |
|--|---|



PLANT PLOT PLAN

ATTACHMENT C

**ATTACHMENT C
REGULATED UNIT DESCRIPTIONS**

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
1	Central Container Receiving Building	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	80 feet x 150 feet	Acid resistant epoxy coated, sloped reinforced concrete	168,510 batteries and 210 drums or a total of 180,060 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 12,638 gallons
2	West Container Receiving Building #1	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	34 feet x 80 feet	Acid resistant epoxy coated, sloped reinforced concrete	36,610 batteries and 48 drums or a total of 39,250 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 2,746 gallons
3	West Container Receiving Building #2	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	34 feet x 38 feet	Acid resistant epoxy coated, sloped reinforced concrete	17,210 batteries and 24 drums or a total of 18,530 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 1,291 gallons
4	Canopied Container Receiving Building	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	60 feet x 91 feet	Sloped reinforced concrete	72,762 batteries and 90 drums or a total of 77,712 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 5,457 gallons
5	Battery Dump Bin Sump	24% sulfuric acid solution	724, 792	D002, D008	5'-0" x 9'-0" x 5'-0"	Double-walled stainless steel	1,683 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
6	RMPS Floor Sump	Sodium sulfate solution	132	D002, D008	4'-0" x 9'-0" x 6'-0"	Double-walled stainless steel	1,615 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank
7	North Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
8	Center Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
9	South Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
10	Acid Storage Tank	24% sulfuric acid solution	724, 792	D002, D008	12'-0" Diameter x 16'-0" Height; No Freeboard	Stainless steel	13,535 gallons	Not applicable	Not applicable	Level monitor	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
11	Overflow Tank	Sodium sulfate solution	132	D002, D004, D006, D008	12'-0" Diameter x 14'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	11,844 gallons	Not applicable	Not applicable	Level monitor	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
12	Paste Thickening Unit (Santa Maria)	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 724, 792	D002, D004, D006, D008	28'-0" Length x 9'-6" Width x 20'-0" Height; 1'-0" Freeboard	Stainless steel	27,000 gallons	310,000 gallons per day	Gravity separation	Overflows to permitted unit No. 11	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
13	Sink/Float Separator	Plastic; rubber; dilute sulfuric acid	181, 724, 792	D002, D008	8'-0" Width x 22'-2.4" Length x 0' to 4'-8" Height; 1'-0" Freeboard	Stainless steel	3,142 gallons	310,000 gallons per day	Gravity separation	Overflows to permitted unit No. 6	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
14	Recycle Tank	dilute sulfuric acid	724, 792	D002, D008	7'-0" Height x 22'-6" Length x 7'-6" Width	Stainless steel	3,209 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 6	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
15	50K Tank	Rainwater; softener regeneration water; backwash water	132	D008	24'-0" Diameter x 18'-0" Height; 4'-0" Freeboard	A283 steel	47,378 gallons	Not applicable	Not applicable	Level monitor	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
16	West Reaction Tank	Sodium sulfate solution; ferric hydroxide	132	D008	10'-0" Diameter x 24'-0" Height; 2'-6" Freeboard	A36 steel	12,631 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 17	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)
17	East Reaction Tank	Sodium sulfate solution; ferric hydroxide	132	D008	10'-0" Diameter x 24'-0" Height; 2'-6" Freeboard	A36 steel	12,631 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 20	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)
18	Pump Tank	Sodium sulfate solution	132	D008	8'-0" Diameter x 9'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	3,008 gallons	Not applicable	Not applicable	Level controller	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)
19	Sludge Tank	Sodium sulfate solution; ferric hydroxide	171	D008	9'-0" Diameter x 16'-8" Height; 1'-2" Freeboard	A36 steel	8,589 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 15	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)
20	Delta Stack Flocculation	Sodium sulfate solution	132	D008	6'-0" Diameter x 7'-0" Height; 2'-3" Freeboard	Stainless steel	1,005 gallons	310,000 gallons per day	Flocculation	Overflows to permitted unit No. 21	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)

ATTACHMENT C (CONT.)

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
21	Delta Stack Clarifier	Sodium sulfate; ferric chloride	132	D008	11'-9" Diameter x 6'-7" Height; 2'-3" Freeboard	Stainless steel	6,272 gallons	310,000 gallons per day	Clarification (Separation)	Overflows to permitted unit No. 18	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)
22	East Equalization Tank	Sodium sulfate solution	132	D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Fiberglass reinforced plastic	39,020 gallons	Not applicable	Not applicable	Level controller	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
23	West Equalization Tank	Sodium sulfate solution	132	D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Fiberglass reinforced plastic	39,020 gallons	Not applicable	Not applicable	Underflows to permitted unit No. 22	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
24	North Oxidation Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 35'-0" Height; 3'-0" Freeboard	Fiberglass reinforced plastic	48,126 gallons	43,200 gallons per day	Oxidation	Overflows to permitted unit No. 25	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
25	South Oxidation Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 35'-0" Height; 3'-0" Freeboard	Fiberglass reinforced plastic	48,126 gallons	43,200 gallons per day	Oxidation	Overflows to permitted unit No. 23	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
26	pH Adjustment Tank #1	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 27	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)

ATTACHMENT C (CONT.)

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
27	pH Adjustment Tank #2	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 28	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
28	pH Adjustment Tank #3	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Level controller	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
29	Process Tank	Sodium sulfate solution	132	D002, D008	16'-0" Diameter x 22'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	31,583 gallons	310,000 gallons per day	Coagulation	Overflows to permitted unit No. 26	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
30	Filtrate Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 24'-0" Height; 1'-0" Freeboard	A36 steel	34,591 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 23	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)
31	North Flue Dust Slurry Sump	Lead dust slurry	172	K069	9'-4½" x 5' Oblong x 5' Deep	Double-walled stainless steel in reinforced concrete	1,600 gallons	Not applicable	Not applicable	Level gauge	Not applicable - double-walled tank with leak detection
32	South Flue Dust Slurry Sump	Lead dust slurry	172	K069	9'-4½" x 5' Oblong x 5' Deep	Double-walled stainless steel in reinforced concrete	1,600 gallons	Not applicable	Not applicable	Level gauge	Not applicable - double-walled tank with leak detection

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
33	Reverb Furnace Feed Room	Reverb Furnace feed	171, 172, 181	D002, D004, D006, D008	16,325 square feet	Sloped reinforced concrete	9,460 tons	Not applicable	Not applicable	Curbs at doorways	Not applicable - double-lined with leak detection
34	Blast Furnace Feed Room	Blast Furnace feed	171, 172, 181	D004, D006, D008	11,250 square feet	Sloped reinforced concrete	3,210 tons	Not applicable	Not applicable	Curbs at doorways	Not applicable - no free liquids
35	Mobile Equipment Wash Station	Wash water with varying lead concentrations	132	D008	20'-0" x 30'-0" sloped bottom	Reinforced concrete	3,321 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank with leak detection
36	Reverb Furnace	Lead; lead alloys	171, 172, 181	D004, D006, D008	19'-0" Width x 39'-5" Length x 12'-9" Height	Refractory brick, exterior support frame	43.37 cubic yards	450 tons per day	Metallurgical reduction	Operational procedures	Smelter Building
37	Blast Furnace	Lead; lead alloys	171, 172, 181	D004, D006, D008	6'-8" Width x 8'-7" Length x 23'-3" Height	Water jacketed steel	3.94 cubic yards	250 tons per day	Metallurgical reduction	Operational procedures	Smelter Building
38	WWTP Area Sump	Sodium sulfate solution	132	D008	4'0" Width x 4'0" Length x 4'0" Height	Double-walled stainless steel in reinforced concrete	479 gallons	Not applicable	Not applicable	Level controller	Not applicable - Double-walled tank with leak detection
39	WWTP Filter Press Sump	Sodium sulfate solution	132	D008	3'0" Width x 3'0" Length x 3'0" Height	Double-walled stainless steel in reinforced concrete	202 gallons	Not applicable	Not applicable	Level controller	Not applicable - Double-walled tank with leak detection

ATTACHMENT C (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment
			CA	RCRA							
40	RMPS Hammer Mill	Spent lead-acid batteries	181 724 792	D002 D004 D006 D008	89.5" Width x 66.5" Depth x 39" Height	Stainless steel	Not applicable	53 tons per hour	Crushing	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
41	Waste Acid Circulation Tank	Sodium sulfate solution	132 792	D002 D004 D006 D008	5' Width x 4' Depth x 5' Height; 0.5" Freeboard	Stainless steel	675 gallons	1,440 gallons per day	Separation	Level gauge	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
42	East Elutriation Column	Dilute sulfuric acid; plastic; rubber; lead metal	181 724 792	D002 D008	21.2" Diameter x 68.5" Length; Taper to 26.5" Diameter x 18" Length; 26.5" Diameter x 25.5" Length	Stainless steel	Not applicable	310,000 gallons per day	Gravity separation	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
43	West Elutriation Column	Dilute sulfuric acid; plastic; rubber; lead metal	181 724 792	D002 D008	21.2" Diameter x 68.5" Length; Taper to 26.5" Diameter x 18" Length; 26.5" Diameter x 25.5" Length	Stainless steel	Not applicable	310,000 gallons per day	Gravity separation	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
44	RMPS Filter Press	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171 132	D002 D004 D006 D008	42"-1" Width x 6'-2" Depth x 5'-10" Height	Cast iron coated with acid-resistant paint	Not applicable	310,000 gallons per day	Dewatering	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)
45	WWTP Filter Press	Sodium sulfate solution; ferric hydroxide	171	D008	25'-10.5" Width x 7'-11" Depth x 6'-10.5" Height	Cast iron coated with acid-resistant paint	Not applicable	310,000 gallons per day	Dewatering	Not applicable	Wastewater Treatment Containment Area Maximum Capacity: 47,400 gallons which is the largest tank (47,378 gallons)

ATTACHMENT D

SOLID WASTE MANAGEMENT UNITS SUMMARY

INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: GNB Technologies Inc.

EPA I.D. NUMBER: CAD097854541

LOCATION City Vernon

State California

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A OR B APPLICATION

	<u>Yes</u>	<u>No</u>
• Landfill	<u>X</u>	<u>—</u>
• Surface Impoundment	<u>—</u>	<u>X</u>
• Land Farm	<u>—</u>	<u>X</u>
• Incinerator	<u>—</u>	<u>Y</u>
• Storage Tank (Above Ground)	<u>Y</u>	<u>—</u>
• Storage Tank (Underground)	<u>—</u>	<u>X</u>
• Container Storage Area	<u>Y</u>	<u>—</u>
• Injection Wells	<u>—</u>	<u>Y</u>
• Wastewater Treatment Units	<u>X</u>	<u>—</u>
• Transfer Stations	<u>—</u>	<u>X</u>
• Waste Recycling Operations	<u>X</u>	<u>—</u>
• Other Waste Handling Areas Not Covered Above	<u>X</u>	<u>—</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous waste or hazardous constituents under RCRA. Also, include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

See Section 15

NOTE: Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A or B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information:

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

See Section 15

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See Section 15

5. Describe the approximate dates and locations of product spills and releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents.


See Section 15

ATTACHMENT E

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer, of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Signature

John Tapper, Vice President

Name and Title (Typed)

California Resource LLC

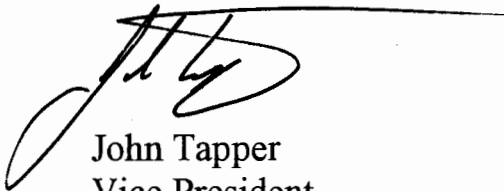
December 17, 1998

EPA Region 9
Hazardous Waste Division
75 Hawthorne Street
H 3-4
San Francisco, California 94105

Re: Change of ownership of the GNB Technologies facility in Vernon California

This letter is to inform you that California Resource LLC will be acquiring the GNB Technologies Inc. facility in Vernon California. As required under California rule 66270.72 in Title 22 of the California Code of Regulations, a new Part A Application identifying the new owner/operator is attached to this letter. This transaction is expected to close in late March of early April 1999. Please let me know if you require any more documentation at this point in the transition. I can be reached by phone at (651) 405-2203.

Sincerely,



John Tapper
Vice President

For EPA Regional Use Only <div style="border: 1px solid black; height: 40px; margin-bottom: 5px;"></div> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> Date Received Month Day Year </div> <div style="width: 60%;"></div> </div>	<h1 style="margin: 0;">EPA</h1> <p style="margin: 5px 0;">United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Hazardous Waste Permit</h2> <h3 style="margin: 0;">Application</h3> <h3 style="margin: 0;">Part A</h3> <p style="margin: 10px 0;">(Read the Instructions before starting)</p>	
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)		
<input type="checkbox"/> A. First Part A Submission		<input checked="" type="checkbox"/> B. Part A Amendment # <u>6</u>
C. Installation's EPA ID Number CAD097854541		D. Secondary ID Number (If applicable)
II. Name of Facility CALIFORNIA RESOURCE LLC		
III. Facility Location (Physical address not P.O. Box or Route Number)		
A. Street 2700 SOUTH INDIANA STREET Street (Continued) 		
City or Town VERNON		State Zip Code CA 90023
County Code <small>(If known)</small>	County Name LOS ANGELES	
B. Land Type (Enter code) P	C. Geographic Location LATITUDE (Degrees, Minutes, & Seconds) LONGITUDE (Degrees, Minutes & Seconds) 34, 00, 22 118, 11, 48	D. Facility Existence Date Month Day Year 1922
IV. Facility Mailing Address		
Street or P.O. Box P.O. BOX 23957		
City or Town LOS ANGELES		State Zip Code CA 90023-1101
V. Facility Contact (Person to be contacted regarding waste activities at facility)		
Name (Last) MARZOLINO		(First) JAMES
Job Title ENVIRONMENTAL MANAGER		Phone Number (Area Code and Number) 323-262-1101 X259
VI. Facility Contact Address (See instructions)		
A. Contact Address Location Mailing Other <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		B. Street or P.O. Box
City or Town		State Zip Code

EPA I.D. Number (Enter from page 1)		Secondary ID Number (Enter from page 1)	
CAD097854541			
VII. Operator Information (See instructions)			
Name of Operator			
CALIFORNIA RESOURCE LLC			
Street or P.O. Box			
2700 SOUTH INDIANA STREET			
City or Town	State	ZIP Code	
VERNON	CA	90023	
Phone Number (Area Code and Number)	B. Operator Type	C. Change of Operator Indicator	Date Changed
323-262-1101	P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Month Day Year
VIII. Facility Owner (See Instructions)			
A. Name of Facility's Legal Owner			
CALIFORNIA RESOURCE LLC			
Street or P.O. Box			
2700 SOUTH INDIANA STREET			
City or Town	State	ZIP Code	
VERNON	CA	90023	
Phone Number (Area Code and Number)	B. Owner Type	C. Change of Owner Indicator	Date Changed
323-262-1101	P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Month Day Year
IX. SIC Codes (4-digit, in order of significance)			
Primary		Secondary	
3341	(Description) LEAD SMELTING & REFINING	SECONDARY	(Description)
Secondary		Secondary	
	(Description)		(Description)
X. Other Environmental Permits (See instructions)			
A. Permit Type (Enter code)	B. Permit Number	C. Description	
E	SCAQMD PERMITS	SEE ATTACHMENT A	
E	0202 CITY OF VERNON HEALTH PERMIT	T WASTE PROCESSING FACILITY	
E	6244 CITY OF VERNON HEALTH PERMIT	T HAZARDOUS MATERIALS CLASS C	
E	2157 CALIFORNIA HIGHWAY PATROL	HAZARDOUS WASTE TRANSPORTER	
		REGISTRATION NUMBER	
E	11092 INDUSTRIAL WASTEWATER	L.A. COUNTY SANITATION DISTRICT	
	DISCHARGE REGISTRATION NUMBER		

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

CAD097854541

XI. Nature of Business (Provide a brief description)

SEE ATTACHMENT B

XII. Process Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	<u>Disposal:</u> Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor	
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace	
D82	Ocean Disposal	Gallons Per Day r Liters Per Day	T90	Pulping Liquor Recovery Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces	
S01	<u>Storage:</u> Container (Barrel, Drum, Etc.)	Gallons or Liters	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
S02	Tank	Gallons or Liters	T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
S03	Waste Pile	Cubic Yards or Cubic Meters	<u>Miscellaneous (Subpart X):</u>		Any Unit of Measure Listed Below
S04	Surface Impoundment	Gallons or Liters	X01	Open Burning/Open Detonation	
S05	Drip Pad	Gallons or Liters	X02	Mechanical Processing	
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	X03	Thermal Unit	
S99	Other Storage	Any Unit of Measure Listed Below	X04	Geologic Repository	Cubic Yards or Cubic Meters
T01	<u>Treatment:</u> Tank	Gallons Per Day or Liters Per Day	X99	Other Subpart X	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boiler	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	I

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
CAD097854541	

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only				
				1. Amount (Specify)	2. Unit Of Measure (Enter code)						
X 1	S	0	2	533.788	G	001					
1	S	0	1	180,060	G	001					
2	S	0	1	39,250	G	001					
3	S	0	1	18,530	G	001					
4	S	0	1	77,712	G	001					
5	S	0	2	1,683	G	001					
6	S	0	2	1,615	G	001					
7	T	0	1	310,000	U	001					
8	T	0	1	310,000	U	001					
9	T	0	1	310,000	U	001					
10	S	0	2	13,535	G	001					
11	S	0	2	11,844	G	001					
12	T	0	1	310,000	U	001					
13	T	0	1	310,000	U	001					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seg w/XII)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
				1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T	0	4				In-situ Vitrification
1							
2							
3							
4							

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
CAD097854541	

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS											
	(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))											
X 1	K	0	5	4	900	P	T	0	3	D	8	0						
X 2	D	0	0	2	400	P	T	0	3	D	8	0						
X 3	D	0	0	1	100	P	T	0	3	D	8	0						
X 4	D	0	0	2														Included With Above

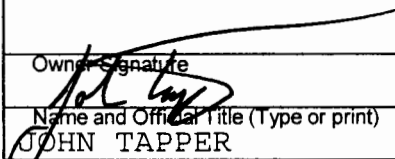
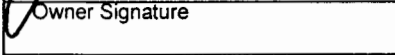
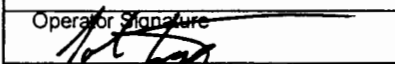

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

CAD097854541

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES									
				(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))			
1	K 0 6 9	2,160	T	S	0	2	T	0	1	S	0	6	X03
2	SPENT LEAD-ACID BATTERIES:												
3	D 0 0 8	200,000	T	S	0	1	T	0	1	S	0	2	S06, X03
4	D 0 0 2	INCLUDED	ABOVE										
5	D 0 0 4	INCLUDED	ABOVE										
6	D 0 0 6	INCLUDED	ABOVE										
7	BATTERY MANUFACTURING PLANT SCRAP:												
8	D 0 0 8	15,000	T	S	0	1	S	0	6	X	0	3	
9	D 0 0 4	INCLUDED	ABOVE										
10	D 0 0 6	INCLUDED	ABOVE										
11	D 0 0 2	INCLUDED	ABOVE										
12	WASTEWATER:												
13	D 0 0 8	160,475	T	S	0	2	T	0	1				
14	WASTEWATER SLUDGE:												
15	D 0 0 8	2,040	T	S	0	2	S	0	6	X	0	3	
16	D 0 0 4	INCLUDED	ABOVE										
17	D 0 0 6	INCLUDED	ABOVE										
18													
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EPA I.D. Number (Enter from page 1) <div style="border: 1px solid black; padding: 2px;">CAD097854541</div>	Secondary ID Number (Enter from page 1) <div style="border: 1px solid black; height: 20px;"></div>
XV. Map	
<p><i>Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</i></p>	
XVI. Facility Drawing	
<p><i>All existing facilities must include a scale drawing of the facility (see instructions for more detail).</i></p>	
XVII. Photographs	
<p><i>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).</i></p>	
XVIII. Certification(s)	
<p><i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i></p>	
Owner Signature 	Date Signed 12/17/98
Name and Official Title (Type or print) JOHN TAPPER VICE PRESIDENT	
Owner Signature 	Date Signed
Name and Official Title (Type or print)	
Operator Signature 	Date Signed 12/17/98
Name and Official Title (Type or print) JOHN TAPPER VICE PRESIDENT	
Operator Signature 	Date Signed
Name and Official Title (Type or print)	
XIX. Comments	
<p>Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)</p>	

ATTACHMENT A



**South Coast
Air Quality Management District**

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2900

NOVEMBER 16, 1992

ID - 044551
GNB INCORPORATED
P.O. BOX 23957
LOS ANGELES CA 90023-0957

OFFICIAL DOCUMENT

ANNUAL VALIDATION OF PERMIT TO OPERATE

Dear Permit Holder:

This letter is the official notice of renewal and acknowledgement of payment for the attached list of Permit(s) To Operate. Operation under this letter and the permit(s) which it renews must be conducted in compliance with all information included with the initial application as well as the initial permit conditions. The equipment must be maintained and kept in good condition at all times. Unless otherwise specifically stated, the original Permit To Operate remains in full force and effect, and must be retained in accordance with the rules and regulations of the South Coast Air Quality Management District.

For further information, or if you have any questions regarding this letter, please call Customer Service at (714) 396-2900.

Sincerely,

James M. Lents, Ph.D.
Executive Officer

Renewal(s) attached



**South Coast
Air Quality Management District**

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2900

NOVEMBER 16, 1992

ID - 044551
GNB INCORPORATED
2700 S INDIANA ST
VERNON CA 90023-4602

PERMIT NUMBER	DESCRIPTION	APPLIC NUMBER	EXPIRATION DATE
M40004	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	123780	11/01/93
M40005	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	123781	11/01/93
M34466	OTHER AGGREGATE CONVEYING	123782	11/01/93
M40009	FURNACE REVERB (SWEATING) LEAD & TYPE	123801	11/01/93
M56001	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	127145	11/01/93
M56003	FURNACE CUPOLA LEAD & TYPE METAL	127247	11/01/93
	BAGHOUSE, HOT		
M56006	SODA ASH CONVEYING	137012	11/01/93
M56008	FURNACE POT LEAD & TYPE METAL	151106	11/01/93
	ABRASIVE BLASTING (OPEN)		
D36339	DRY FILTER (>100-500 SQ FT)	167284	11/01/93
D36345	OTHER AGGREGATE SIZE REDUCTION	167285	11/01/93
D36344	SCRUBBER OTHER	167286	11/01/93
D36338	DRY FILTER (>100-500 SQ FT)	167287	11/01/93
D36343	TREATING OTHER SPENT SULFURIC ACID	167288	11/01/93
D36342	OTHER AGGREGATE BLENDING	167289	11/01/93
D36341	AFTERBURNER, DIRECT FLAME	178383	11/01/93
D22935	FURNACE POT LEAD & TYPE METAL	178384	11/01/93
D22932	FURNACE POT LEAD & TYPE METAL	178385	11/01/93
D22933	FURNACE POT LEAD & TYPE METAL	178386	11/01/93
D23197	FURNACE POT LEAD & TYPE METAL	178387	11/01/93
D23195	FURNACE POT LEAD & TYPE METAL	178388	11/01/93
D34293	FURNACE POT LEAD & TYPE METAL	178389	11/01/93
D34308	FURNACE POT LEAD & TYPE METAL	178390	11/01/93
D23196	FURNACE POT LEAD & TYPE METAL	178391	11/01/93
D22934	FURNACE POT LEAD & TYPE METAL	178392	11/01/93
D22931	FURNACE POT LEAD & TYPE METAL	178393	11/01/93
D34309	FURNACE POT LEAD & TYPE METAL	178394	11/01/93
D34310	FURNACE POT LEAD & TYPE METAL	178395	11/01/93
D34311	FURNACE POT LEAD & TYPE METAL	178396	11/01/93
D34312	FURNACE POT LEAD & TYPE METAL	178397	11/01/93
D36340	BAGHOUSE, HOT	178893	11/01/93
M95180	SERV STAT STORAGE & DISPENSING GASOLINE	183380	11/01/93



**South Coast
Air Quality Management District**

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2900

NOVEMBER 16, 1992

ID - 044551
GNB INCORPORATED
2700 S INDIANA ST
VERNON CA 90023-4602

PERMIT RENEWALS			
PERMIT NUMBER	DESCRIPTION	APPLIC NUMBER	EXPIRATION DATE
-----	-----	-----	-----
D23190	STORAGE TANK FX RF W/CTL LPG	192994	11/01/93
D36326	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	237556	11/01/93

ATTACHMENT B

ATTACHMENT B

Item XI of the Part A Application —

The Nature of the Business of Lead-Acid Battery Reclamation

The life cycle of a battery begins with its construction at the manufacturing plant, followed by the purchase and use of the battery for electrical ignition. The average life of an automotive battery is approximately three years. Once the battery can no longer hold a charge, the "dead," "spent," or "junk" battery is typically returned to the retailer at the time of replacement purchase. The retailer may accumulate a trailer load before either shipping the batteries back to a manufacturer's collection point, scrap dealer, or directly to a secondary lead plant (battery recycling plant). Batteries are stored at a secondary lead recycling plant before being separated into their constituent parts. The lead smelted and recovered from the spent batteries is primarily used at a battery manufacturing plant to produce new batteries. The plastic battery case material is also reclaimed and used to produce new battery cases.

Due to a drop in lead prices and an increase in the cost of production, less than half of the secondary lead recyclers in the United States in business in 1980 are still operating today. However, the number of used batteries being generated has increased with population growth and will continue to do so with the increased use of electric vehicles.

GNB currently owns and operates three secondary lead recycling facilities located in Vernon, California, Frisco, Texas, and Columbus, Georgia. GNB also owns and operates seven automotive and four industrial lead-acid battery manufacturing facilities and a number of distribution centers throughout the United States. The manufacturing facilities and distribution centers serve as collection points in the battery recycling chain.

The resource recycling plant in Vernon, California has an average production of 100,000 tons of lead per year with a maximum production capacity of 215,000 tons per year. This maximum production capacity is equivalent to recycling approximately 19.5 million automotive batteries per year. The plant also recycles lead bearing plant scrap, primarily from lead-acid battery manufacturers.

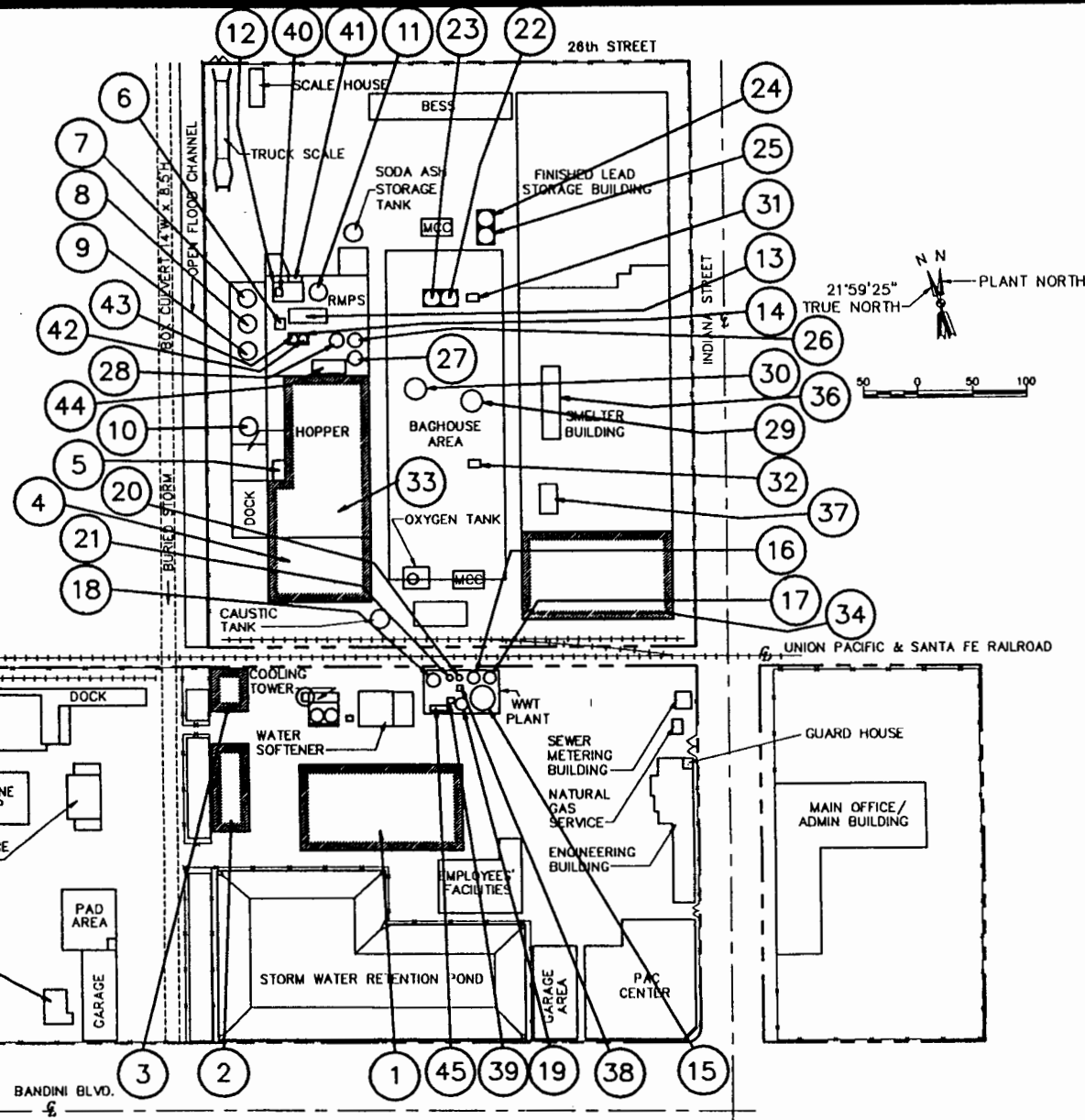
ATTACHMENT C

LEGEND

Permitted Buildings

- 1 Central Container Receiving Building
- 2 West Container Receiving Building #1
- 3 West Container Receiving Building #2
- 4 Canopied Container Receiving Building
- 5 Battery Dump Bin Sump
- 6 RMPS Floor Sump
- 7 North Mud Tank
- 8 Center Mud Tank
- 9 South Mud Tank
- 10 Acid Storage Tank
- 11 Overflow Tank
- 12 Paste Thickening Unit (Santa Maria)
- 13 Sink/Float Separator
- 14 Recycle Tank
- 15 SOK Tank
- 16 West Reaction Tank
- 17 East Reaction Tank
- 18 Pump Tank
- 19 Sludge Tank
- 20 Delta Stock Flocculation
- 21 Delta Stock Clarifier
- 22 East Equalization Tank

- 23 West Equalization Tank
- 24 North Oxidation Tank
- 25 South Oxidation Tank
- 26 pH Adjustment Tank #1
- 27 pH Adjustment Tank #2
- 28 pH Adjustment Tank #3
- 29 Process Tank
- 30 Filtrate Tank
- 31 North Flue Dust Slurry Sump
- 32 South Flue Dust Slurry Sump
- 33 Reverb Furnace Feed Room
- 34 Blast Furnace Feed Room
- 35 Mobile Equipment Wash Sump
- 36 Reverb Furnace
- 37 Blast Furnace
- 38 WWTP Area Sump
- 39 WWTP Filter Press Sump
- 40 RMPS Hammer Mill
- 41 Waste Acid Circulation Tank
- 42 East Elutriation Column
- 43 West Elutriation Column
- 44 RMPS Filter Press
- 45 WWTP Filter Press



PLANT PLOT PLAN

ATTACHMENT D

ATTACHMENT D REGULATED UNIT DESCRIPTIONS

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	Central Container Receiving Building	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	80 feet x 150 feet	Acid resistant epoxy coated, sloped reinforced concrete	168,510 batteries and 210 drums or a total of 180,060 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 12,638 gallons	66264.175(b)(3) Compliance: _____ 66264.175(c) Compliance: _____
	West Container Receiving Building #1	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	34 feet x 80 feet	Acid resistant epoxy coated, sloped reinforced concrete	36,610 batteries and 48 drums or a total of 39,250 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 2,746 gallons	66264.175(b)(3) Compliance: _____ 66264.175(c) Compliance: _____
	West Container Receiving Building #2	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	34 feet x 38 feet	Acid resistant epoxy coated, sloped reinforced concrete	17,210 batteries and 24 drums or a total of 18,530 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 1,291 gallons	66264.175(b)(3) Compliance: _____ 66264.175(c) Compliance: _____
	Canopied Container Receiving Building	Spent lead-acid batteries; lead-bearing plant scrap	181, 724, 792, 171, 172	D002, D004, D006, D008	60 feet x 91 feet	Sloped reinforced concrete	72,762 batteries and 90 drums or a total of 77,712 gallons	Not applicable	Not applicable	Operational procedures	Independently sloped to collection point, which drains to Battery Dump Bin Sump Area Minimum capacity: 5,457 gallons	Scheduled for closure: July 1997
	Battery Dump Bin Sump	24% sulfuric acid solution	724, 792	D002, D008	5'-0" x 9'-0" x 5'-0"	Double-walled stainless steel	1,683 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(c)(3) Compliance: _____

ATTACHMENT D (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	RMPS Floor Sump	Sodium sulfate solution	132	D002, D008	4'-0" x 9'-0" x 6'-0"	Double-walled stainless steel	1,615 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(c)(3) Compliance: _____
	North Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
	Center Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
	South Mud Tank	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 132	D002, D004, D006, D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Stainless steel	39,020 gallons	310,000 gallons per day	Desulfurization	Level indicator	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
	Acid Storage Tank	24% sulfuric acid solution	724, 792	D002, D008	12'-0" Diameter x 16'-0" Height; No Freeboard	Stainless steel	13,535 gallons	Not applicable	Not applicable	Level monitor	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____

ATTACHMENT D (CONT.)

Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
		CA	RCRA								
Overflow Tank	Sodium sulfate solution	132	D002, D004, D006, D008	12'-0" Diameter x 14'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	11,844 gallons	Not applicable	Not applicable	Level monitor	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
Paste Thickening Unit (Santa Maria)	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171, 724, 792	D002, D004, D006, D008	28'-0" Length x 9'-6" Width x 20'-0" Height; 1'-0" Freeboard	Stainless steel	27,000 gallons	310,000 gallons per day	Gravity separation	Overflows to permitted unit No. 11	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
Sink/Float Separator	Plastic; rubber; dilute sulfuric acid	181, 724, 792	D002, D008	8'-0" Width x 22'-2.4" Length x 0' to 4'-8" Height; 1'-0" Freeboard	Stainless steel	3,142 gallons	310,000 gallons per day	Gravity separation	Overflows to permitted unit No. 6	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(c) Compliance: _____ 66264.193(e) Compliance: _____
Recycle Tank	dilute sulfuric acid	724, 792	D002, D008	7'-0" Height x 22'-6" Length x 7'-6" Width	Stainless steel	3,209 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 6	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
50K Tank	Rainwater; softener regeneration water; backwash water	132	D008	24'-0" Diameter x 18'-0" Height; 4'-0" Freeboard	A283 steel	47,378 gallons	Not applicable	Not applicable	Level monitor	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____

ATTACHMENT D (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	West Reaction Tank	Sodium sulfate solution; ferric hydroxide	132	D008	10'-0" Diameter x 24'-0" Height; 2'-6" Freeboard	A36 steel	12,631 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 17	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	East Reaction Tank	Sodium sulfate solution; ferric hydroxide	132	D008	10'-0" Diameter x 24'-0" Height; 2'-6" Freeboard	A36 steel	12,631 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 20	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	Pump Tank	Sodium sulfate solution	132	D008	8'-0" Diameter x 9'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	3,008 gallons	Not applicable	Not applicable	Level controller	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	Sludge Tank	Sodium sulfate solution; ferric hydroxide	171	D008	9'-0" Diameter x 16'-8" Height; 1'-2" Freeboard	A36 steel	8,589 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 15	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.192(c) Compliance: _____ 66264.193(e) Compliance: _____
	Delta Stack Flocculation	Sodium sulfate solution	132	D008	6'-0" Diameter x 7'-0" Height; 2'-3" Freeboard	Stainless steel	1,005 gallons	310,000 gallons per day	Flocculation	Overflows to permitted unit No. 21	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____

ENCLOSURE A

SOLID WASTE MANAGEMENT UNITS SUMMARY

INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: GNB Technologies Inc.

EPA I.D. NUMBER: CAD097854541

LOCATION City Vernon

State California

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE: - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A OR B APPLICATION

	<u>Yes</u>	<u>No</u>
• Landfill	<u>X</u>	<u> </u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>Y</u>
• Storage Tank (Above Ground)	<u>Y</u>	<u> </u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u>Y</u>	<u> </u>
• Injection Wells	<u> </u>	<u>Y</u>
• Wastewater Treatment Units	<u>X</u>	<u> </u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u>X</u>	<u> </u>
• Other Waste Handling Areas Not Covered Above	<u>Y</u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous waste or hazardous constituents under RCRA. Also, include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

See Section 15

NOTE: Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A or B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information:

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

See Section 15

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See Section 15

5. Describe the approximate dates and locations of product spills and releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents.

See Section 15

Date: May 1997

Revision No.: 4

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ATTACHMENT D (CONT.)

Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
		CA	RCRA								
Delta Stack Clarifier	Sodium sulfate; ferric chloride	132	D008	11'-9" Diameter x 6'-7" Height; 2'-3" Freeboard	Stainless steel	6,272 gallons	310,000 gallons per day	Clarification (Separation)	Overflows to permitted unit No. 18	Wastewater Treatment Containment Area Minimum capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
East Equalization Tank	Sodium sulfate solution	132	D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Fiberglass reinforced plastic	39,020 gallons	Not applicable	Not applicable	Level controller	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
West Equalization Tank	Sodium sulfate solution	132	D008	18'-0" Diameter x 22'-0" Height; 1'-6" Freeboard	Fiberglass reinforced plastic	39,020 gallons	Not applicable	Not applicable	Underflows to permitted unit No. 22	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
North Oxidation Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 35'-0" Height; 3'-0" Freeboard	Fiberglass reinforced plastic	48,126 gallons	43,200 gallons per day	Oxidation	Overflows to permitted unit No. 25	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
South Oxidation Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 35'-0" Height; 3'-0" Freeboard	Fiberglass reinforced plastic	48,126 gallons	43,200 gallons per day	Oxidation	Overflows to permitted unit No. 23	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
pH Adjustment Tank #1	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 27	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____

Date: May 1997

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ATTACHMENT D (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	pH Adjustment Tank #2	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Overflows to permitted unit No. 28	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	pH Adjustment Tank #3	Sodium sulfate solution	132	D002, D008	9'-0" Diameter x 9'-0" Height; No Freeboard	Fiberglass reinforced plastic	4,283 gallons	310,000 gallons per day	pH adjustment	Level controller	Raw Material Preparation System Building/Sumps Minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	Process Tank	Sodium sulfate solution	132	D002, D008	16'-0" Diameter x 22'-0" Height; 1'-0" Freeboard	Fiberglass reinforced plastic	31,583 gallons	310,000 gallons per day	Coagulation	Overflows to permitted unit No. 26	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	Filtrate Tank	Sodium sulfate solution	132	D008	16'-0" Diameter x 24'-0" Height; 1'-0" Freeboard	A36 steel	34,591 gallons	Not applicable	Not applicable	Overflows to permitted unit No. 23	'Concrete' Yard System Minimum capacity: 48,200 gallons which is the largest tank (48,126 gallons)	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(e) Compliance: _____
	North Flue Dust Slurry Sump	Lead dust slurry	172	K069	9'-4½" x 5' Oblong x 5' Deep	Double-walled stainless steel in reinforced concrete	1,600 gallons	Not applicable	Not applicable	Level gauge	Not applicable - double-walled tank with leak detection	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____
	South Flue Dust Slurry Sump	Lead dust slurry	172	K069	9'-4½" x 5' Oblong x 5' Deep	Double-walled stainless steel in reinforced concrete	1,600 gallons	Not applicable	Not applicable	Level gauge	Not applicable - double-walled tank with leak detection	66264.191(b) Compliance: _____ 66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____

Date: May 1997

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ATTACHMENT D (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	Reverb Furnace Feed Room	Reverb Furnace feed	171, 172, 181	D002, D004, D006, D008	16,325 square feet	Sloped reinforced concrete	9,460 tons	Not applicable	Not applicable	Curbs at doorways	Not applicable - double-lined with leak detection	66264.1101 Compliance: _____
	Blast Furnace Feed Room	Blast Furnace feed	171, 172, 181	D004, D006, D008	11,250 square feet	Sloped reinforced concrete	3,210 tons	Not applicable	Not applicable	Curbs at doorways	Not applicable - no free liquids	66264.1101(c)(1)(iii) Compliance: _____
	Mobile Equipment Wash Station	Wash water with varying lead concentrations	132	D008	20'-0" x 30'-0" sloped bottom	Reinforced concrete	3,321 gallons	Not applicable	Not applicable	Level controller	Not applicable - double-walled tank with leak detection	66264.191(c) Compliance: _____ 66264.191(f) Compliance: _____ 66264.193(c)(3) Compliance: _____
	Reverb Furnace	Lead; lead alloys	171, 172, 181	D004, D006, D008	19'-0" Width x 39'-5" Length x 12'-9" Height	Refractory brick, exterior support frame	43.37 cubic yards	450 tons per day	Metallurgical reduction	Operational procedures	Smelter Building	40 CFR 63, Subpart X Compliance: _____ 40 CFR 63.544 Compliance: _____ 40 CFR 63.549 Compliance: _____
	Blast Furnace	Lead; lead alloys	171, 172, 181	D004, D006, D008	6'-8" Width x 8'-7" Length x 23'-3" Height	Water jacketed steel	3.94 cubic yards	250 tons per day	Metallurgical reduction	Operational procedures	Smelter Building	40 CFR 63, Subpart X Compliance: _____ 40 CFR 63.544 Compliance: _____ 40 CFR 63.549 Compliance: _____
	WWTP Area Sump	Sodium sulfate solution	132	D008	4'-0" Width x 4'-0" Length x 4'-0" Height	Double-walled stainless steel in reinforced concrete	479 gallons	Not applicable	Not applicable	Level controller	Not applicable - Double-walled tank with leak detection	66264.192(b) Compliance: _____
	WWTP Filter Press Sump	Sodium sulfate solution	132	D008	3'-0" Width x 3'-0" Length x 3'-0" Height	Double-walled stainless steel in reinforced concrete	202 gallons	Not applicable	Not applicable	Level controller	Not applicable - Double-walled tank with leak detection	66264.192(b) Compliance: _____

ATTACHMENT D (CONT.)

Unit No.	Unit Description	Content	Waste Codes		Tank/Unit Size	Tank/Unit Material	Capacity	Treatment Rate	Treatment Type	Overfill Protection	Secondary Containment	Action Date (if necessary)
			CA	RCRA								
	RMPS Hammer Mill	Spent lead-acid batteries	181 724 792	D002 D004 D006 D008	89.5" Width x 66.5" Depth x 39" Height	Stainless steel	Not applicable	53 tons per hour	Crushing	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66270.23(a)(2) Compliance: _____
	Waste Acid Circulation Tank	Sodium sulfate solution	132 792	D002 D004 D006 D008	5' Width x 4' Depth x 5' Height; 0.5' Freeboard	Stainless steel	675 gallons	1,440 gallons per day	Separation	Level gauge	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66264.192(b) Compliance: _____ 66264.193(e) Compliance: _____
	East Elutriation Column	Dilute sulfuric acid; plastic; rubber; lead metal	181 724 792	D002 D008	21.2" Diameter x 68.5" Length; Taper to 26.5" Diameter x 18" Length; 26.5" Diameter x 25.5" Length	Stainless steel	Not applicable	310,000 gallons per day	Gravity separation	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66270.23(a)(2) Compliance: _____
	West Elutriation Column	Dilute sulfuric acid; plastic; rubber; lead metal	181 724 792	D002 D008	21.2" Diameter x 68.5" Length; Taper to 26.5" Diameter x 18" Length; 26.5" Diameter x 25.5" Length	Stainless steel	Not applicable	310,000 gallons per day	Gravity separation	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66270.23(a)(2) Compliance: _____
	RMPS Filter Press	Lead oxide; lead sulfate; lead carbonate; sodium sulfate; sodium carbonate	171 132	D002 D004 D006 D008	42"-1" Width x 6'-2" Depth x 5'-10" Height	Cast iron coated with acid-resistant paint	Not applicable	310,000 gallons per day	Dewatering	Not applicable	Raw Material Preparation System Building/Sumps minimum capacity: 39,100 gallons which is the largest tank (39,020 gallons)	66270.23(a)(2) Compliance: _____
	WWTP Filter Press	Sodium sulfate solution; ferric hydroxide	171	D008	25'-10.5" Width x 7'-11" Depth x 6'-10.5" Height	Cast iron coated with acid-resistant paint	Not applicable	310,000 gallons per day	Dewatering	Not applicable	Wastewater Treatment Containment Area Maximum Capacity: 47,400 gallons which is the largest tank (47,378 gallons)	66270.23(a)(2) Compliance: _____

STATE OF CALIFORNIA

REGIONAL WATER QUALITY CONTROL BOARD
DEPARTMENT OF HEALTH SERVICES
SOLID WASTE MANAGEMENT BOARD
ATTN: ATTORNEY GENERAL

APPLICATION FOR FACILITY PERMIT/WASTE DISCHARGE

This form is to be used for filing waste (check all appropriate)

1. ☐ REPORT OF WASTE DISCHARGE
(pursuant to Division 7 of the State Water Code)
2. ☒ APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
(pursuant to Health and Safety Code Section 25200)
3. ☐ APPLICATION FOR A SOLID WASTE FACILITIES PERMIT
(pursuant to Government Code Section 65796.30)
4. ☐ APPLICATION FOR A RUBBISH DUMP PERMIT
(pursuant to Public Resources Code Sections 4371-4375 and 4438)

FOR OFFICE USE ONLY

Form 200 Rev'd
Fee (HWQCB) (SWMB)
Letter to Discharger _____
Report Rec'd _____
Effective Date _____
CDF Notified _____
DOHS No. _____
SWMB No. _____

I. FACILITY

A. NAME OF FACILITY <u>GNB Technologies Inc.</u>	TELEPHONE # <u>(213) 262-1101</u>
ADDRESS <u>2700 S. Indiana Ave., Vernon, CA 90058</u>	SIP CODE
B. NAME OF LEGAL OWNER OF FACILITY <u>GNB Technologies Inc.</u>	TELEPHONE # <u>(770) 551-0300</u>
ADDRESS <u>375 Northridge Road, Ste. 300, Atlanta, GA 30350</u>	SIP CODE
C. NAME OF BUSINESS OPERATING FACILITY <u>Same</u>	TELEPHONE # <u>()</u>
ADDRESS	SIP CODE
D. TYPE OF BUSINESS OPERATING FACILITY <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Government Agency	
E. NAME OF OWNER(S) OF BUSINESS OPERATING FACILITY	TELEPHONE # <u>()</u>
ADDRESS WHERE LEGAL NOTICE MAY BE GIVEN	SIP CODE

II. REASON FOR FILING

CHECK ALL APPROPRIATE:

A. <input type="checkbox"/> New discharge or facility	D. <input type="checkbox"/> Change in character of discharge	G. <input type="checkbox"/> Change in business operating facility
B. <input checked="" type="checkbox"/> Existing discharge or facility	E. <input type="checkbox"/> Change in place or method of disposal	H. <input type="checkbox"/> Enlargement of existing facility
C. <input type="checkbox"/> Increase in quantity of discharge	F. <input type="checkbox"/> Change in design or operation	I. <input type="checkbox"/> Other (explain below)

III. TYPE OF OPERATION

CHECK ALL APPROPRIATE:

A. <input type="checkbox"/> Transfer station	D. <input type="checkbox"/> Sewage treatment	G. <input type="checkbox"/> Woodwaste site
B. <input type="checkbox"/> Solid waste disposal site	E. <input type="checkbox"/> Industry (on-site disposal facility)	H. <input type="checkbox"/> Other (explain below)
C. <input checked="" type="checkbox"/> Hazardous waste site	F. <input type="checkbox"/> Industry (whichever to permit)	

IV. TYPE OF WASTE

CHECK ALL APPROPRIATE:

A. <input type="checkbox"/> Sewage, sewage sludge, and/or septic tank pumpings	E. <input type="checkbox"/> Agricultural wastes	I. <input type="checkbox"/> Inert materials
B. <input checked="" type="checkbox"/> Industrial wastes	F. <input type="checkbox"/> Animal wastes	J. <input type="checkbox"/> Dead animals
C. <input type="checkbox"/> Municipal solid wastes	G. <input type="checkbox"/> Forest product wastes	K. <input type="checkbox"/> Tires
D. <input checked="" type="checkbox"/> Hazardous wastes	H. <input type="checkbox"/> Construction/demolition wastes	L. <input type="checkbox"/> Other (explain below)

V. SITE DESIGN CAPACITY

A. PRESENT POPULATION OR CAPACITY	B. DESIGN POPULATION OR ULTIMATE CAPACITY	C. LIFE EXPECTANCY (years)
-----------------------------------	---	----------------------------

VI. QUANTITY OF WASTES			
A. PRESENT OR PROPOSED DAILY FLOW (IN MGD):	860 tons/day	AVERAGE 650 tons/day	B. DESIGN FLOW (IN MGD) 860 tons/day
C. SOLID WASTE DISPOSAL SITE (IN TONS OR CUBIC YARDS):	NA	TOTAL IN PLACE QUANTITY NA	D. AREA IN WHICH SOIL WILL BE DISTURBED (IN ACRES) NA
TOTAL WASTE NA			

VII. LOCATION OF POINT OF DISPOSAL OR OPERATION
 (DESIGN AND ATTACH MAP, SKETCH, OR LOCATION ON U.S.G.S. QUADRANGLE MAP, 7.5 OR 15 MINUTE SERIES.)
 LIST DISTANCES OR BEARING AND DISTANCE FROM SECTION CORNER OR QUARTER CORNER, SECTION, TOWNSHIP, RANGE, BASE AND MERIDIAN

GNB is a recycler of lead acid storage batteries and other lead bearing materials.

In the recycling process GNB "treats" materials but does not "dispose" on the land.

a recycler, GNB is engaged in "Metals Recovery".

VIII. SOURCE OF WATER SUPPLY (CHECK ALL APPROPRIATE)	
A. <input checked="" type="checkbox"/> MUNICIPAL OR UTILITY SERVICE: NAME OF WATER PURVEYOR California Water Service ADDRESS OF PURVEYOR	B. <input type="checkbox"/> INDIVIDUAL WELLS C. <input type="checkbox"/> SURFACE SUPPLY: NAME OF STREAM, LAKE, SPRING, ETC. (IF NAMED) TYPE OF WATER RIGHT <input type="checkbox"/> Riparian <input type="checkbox"/> Appropriation WATER RIGHTS PERMIT NO. (IF ANY)

IX. ENVIRONMENTAL IMPACT REPORT (EIR)	
Has an EIR been prepared for this project?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No An EIR is currently being prepared
If "Yes", please enclose a copy.	
If "No", will an EIR be prepared?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Will a negative declaration be prepared?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If "Yes", please answer the following:	WHO WILL PREPARE THE NEGATIVE DECLARATION? NA
APPROVAL DATE OF EIR/DECLARATION	

CERTIFICATION

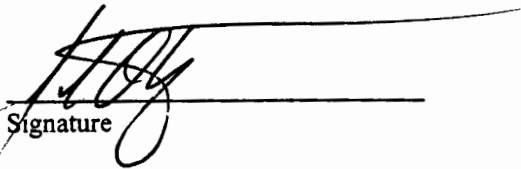

I hereby certify under penalty of perjury that the information provided in this application and in any attachments is true and accurate to the best of my knowledge.

SIGNATURE OF OWNER OF FACILITY	SIGNATURE OF OPERATOR OF FACILITY
PRINTED OR TYPED NAME	PRINTED OR TYPED NAME
Plant Manager	David Wesley
TITLE	TITLE
Plant Manager	Plant Manager
DATE	DATE
LIST TITLES OF ANY ATTACHMENTS:	

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer, of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature John Tapper-Vice President

Name and Title (Typed)

FORM 1 GENERAL	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> FCAD097834541 </div>
<div style="border: 1px solid black; padding: 10px;"> <p>PLEASE PLACE LABEL IN THIS SPACE</p> </div>			GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, it in the designated space. Review the information carefully; if any of it is incorrect, through it and enter the correct data in appropriate fill-in area below. Also, if the preprinted data is absent (the area to left of the label space lists the information that should appear), please provide it in proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B) must be completed regardless). Complete items if no label has been provided. Refer to the instructions for detailed item definitions and for the legal authorizations under which this data is collected.</p>

II. POLLUTANT CHARACTERISTICS				
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to a question, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.				
SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
J. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

III. NAME OF FACILITY
<div style="border: 1px solid black; padding: 2px;"> 1 SKIP GNB INCORPORATED </div>

IV. FACILITY CONTACT
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> A. NAME & TITLE (last, first, & title) 2 CLARK KEN TECHNICAL MANAGER </div> <div style="width: 35%;"> B. PHONE (area code & no.) 213 262 1101 </div> </div> </div>

V. FACILITY MAILING ADDRESS
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex;"> <div style="width: 60%;"> A. STREET OR P.O. BOX 3 2700 S. INDIANA STREET </div> <div style="width: 40%;"> B. CITY OR TOWN 4 LOS ANGELES </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 30%;"> C. STATE CA </div> <div style="width: 70%;"> D. ZIP CODE 90023 </div> </div> </div>

VI. FACILITY LOCATION
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex;"> <div style="width: 60%;"> A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 2700 S. INDIANA STREET </div> <div style="width: 40%;"> B. COUNTY NAME LOS ANGELES </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 30%;"> C. CITY OR TOWN 6 VERNON </div> <div style="width: 30%;"> D. STATE CA </div> <div style="width: 20%;"> E. ZIP CODE 90058 </div> <div style="width: 20%;"> F. COUNTY CODE (if known) 032 </div> </div> </div>

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	3	4	(specify)	7		(specify)
Secondary Lead Smelting				NA			
C. THIRD				D. FOURTH			
7				(specify)	7		(specify)
NA				NA			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name item VIII owner?	
B G N B I N C O R P O R A T E D												<input checked="" type="checkbox"/> YES	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)	
F - FEDERAL S - STATE P - PRIVATE				M - PUBLIC (other than federal or state) O - OTHER (specify)				P (specify)		A		6 1 2 6 8 1 5 0	
E. STREET OR P.O. BOX													
P. O. BOX 6 4 1 4 0													
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND			
B S T. P A U L						M N		5 5 1 6 4		is the facility located on Indian land <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
9	N			9	P		
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
9	U			9			
C. RCRA (Hazardous Wastes)				F. OTHER (specify)			
9	R			9			

(specify) See Attachment, Operation

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Recycling of lead acid storage batteries and production of refined lead and lead alloys.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in this application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Edward L. Puckett General Manager	<i>EL Puckett</i>	2-7-91

COMMENTS FOR OFFICIAL USE ONLY

C

CONTINUE ON REV

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item I to indicate how the waste will be stored, treated, end/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pound per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F C A D 0 9 7 8 5 4 5 4 1 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3 4 0 0 0 2 2

1 1 8 1 1 0 4 8

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Edward L. Puckett
General Manager

B. SIGNATURE

Edward L. Puckett

C. DATE SIGNED

2-7-91

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Edward L. Puckett
General Manager

B. SIGNATURE

Edward L. Puckett

C. DATE SIGNED

2-7-91

Continued from page 2.

NOTE: Photocopy this page before completion if you have more than 26 wastes to list.

Form Approved OMB No. 158-SB0004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W C A D 0 9 7 8 5 4 5 4 1 1													W DUP 2 DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																			
							1. PROCESS CODES (enter)												2. PROCESS DESCRIPTION (If a code is not entered in D(1))							
1	D	0	0	2	44,500	T	T	0	1																	
2	K	0	6	9	4,643	T	T	0	1																	
3	D	0	0	8	170,500	T	T	0	1																	
4																										
5																										
6																										
7																										
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V. FACILITY DRAWING (see page 4)

See attached Operation Plan



FORM 1 EPA GENERAL INFORMATION

Consolidated Permit Program
(Read the "General Instructions" before starting.)

EPA I.D. NUMBER: CAD09785

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space), provide it in the proper fill-in area below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-d which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorities under which this data is collected.

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your facility is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	ATTACHED		YES	NO	ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2C)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the basement stream containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1. NAME OF FACILITY: CNB INCORPORATED LOS ANGELES SMELTER

IV. FACILITY CONTACT

2. NAME & TITLE (last, first, & title): CLARK KEN TECHNICAL MANAGER

3. PHONE (area code & no.): 213 262 1101

V. FACILITY MAILING ADDRESS

4. STREET OR P.O. BOX: 2700 S INDIANA STREET

5. CITY OR TOWN: LOS ANGELES

6. STATE: CA

7. ZIP CODE: 90023

VI. FACILITY LOCATION

8. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 2700 S INDIANA STREET

9. COUNTY NAME: LOS ANGELES

10. CITY OR TOWN: VERNON

11. STATE: CA

12. ZIP CODE: 90058

13. COUNTY CODE: 03

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	3	3	C	7		
15	16	17	18	15	16	17	18
(specify) SECONDARY LEAD SMELTER				(specify) NA			
C. THIRD				D. FOURTH			
C	7			C	7		
15	16	17	18	15	16	17	18
(specify) NA				(specify) NA			

VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?					
C	8 G N B I N C O R P O R A T E D														<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
15	16														55	56				
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)					
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)															P (specify)					
P															6 1 2 6 8 1 5 0 0 0					
E. STREET OR P.O. BOX																				
P O B O X 6 4 1 4 0																				
F. CITY OR TOWN															G. STATE		H. ZIP CODE		IX. INDIAN LAND	
B S T P A U L															M N		5 5 1 6 4		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
																			52	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	T	I								C	T	I							
9	N									9	P								
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	T	I								C	T	I							
9	U									9									
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	T	I								C	T	I							
9	R									9									
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				

SEE ATTACHMENT.

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

RECYCLING OF LEAD ACID STORAGE BATTERIES AND PRODUCTION OF REFINED LEAD AND LEAD ALLOYS.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
ROBERT L. SMITH, DIRECTOR, WESTERN REGION	Robert L. Smith	7/5/85

COMMENTS FOR OFFICIAL USE ONLY

C

FORM 3 RCRA		 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program <small>(This information is required under Section 3005 of RCRA.)</small>		1. EPA I.D. NUMBER S F C A D 0 9 7 8 5 4 5 4 1 T/A C 1 2 13 14 15																																																																																			
FOR OFFICIAL USE ONLY																																																																																								
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)		COMMENTS																																																																																				
A		8 5 0 7 0 9																																																																																						
II. FIRST OR REVISED APPLICATION																																																																																								
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.																																																																																								
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)																																																																																								
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)																																																																																								
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)																																																																																								
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)																																																																																								
REF: 40 CFR 266 SUBPART G																																																																																								
B. REVISED APPLICATION (place an "X" below and complete Item I above)																																																																																								
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS																																																																																								
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT																																																																																								
III. PROCESSES - CODES AND DESIGN CAPACITIES																																																																																								
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).																																																																																								
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.																																																																																								
1. AMOUNT - Enter the amount.																																																																																								
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.																																																																																								
<table border="0" style="width:100%;"><tr><td style="width:25%;">PROCESS</td><td style="width:10%;">PRO- CESS CODE</td><td style="width:25%;">APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</td><td style="width:25%;">PROCESS</td><td style="width:10%;">PRO- CESS CODE</td><td style="width:25%;">APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</td></tr><tr><td>Storage:</td><td></td><td></td><td>Treatment:</td><td></td><td></td></tr><tr><td>CONTAINER (barrel, drum, etc.)</td><td>S01</td><td>GALLONS OR LITERS</td><td>TANK</td><td>T01</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>TANK</td><td>S02</td><td>GALLONS OR LITERS</td><td>SURFACE IMPOUNDMENT</td><td>T02</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>WASTE PILE</td><td>S03</td><td>CUBIC YARDS OR CUBIC METERS</td><td>INCINERATOR</td><td>T03</td><td>TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>S04</td><td>GALLONS OR LITERS</td><td></td><td></td><td></td></tr><tr><td>Disposal:</td><td></td><td></td><td>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)</td><td></td><td></td></tr><tr><td>INJECTION WELL</td><td>D79</td><td>GALLONS OR LITERS</td><td></td><td>T04</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>LANDFILL</td><td>D80</td><td>ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER</td><td></td><td></td><td></td></tr><tr><td>LAND APPLICATION</td><td>D81</td><td>ACRES OR HECTARES</td><td></td><td></td><td></td></tr><tr><td>OCEAN DISPOSAL</td><td>D82</td><td>GALLONS PER DAY OR LITERS PER DAY</td><td></td><td></td><td></td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>D83</td><td>GALLONS OR LITERS</td><td></td><td></td><td></td></tr></table>															PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	Storage:			Treatment:			CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY	TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY	WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR	SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS				Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)			INJECTION WELL	D79	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY	LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER				LAND APPLICATION	D81	ACRES OR HECTARES				OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY				SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS					
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EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																																								
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LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY																																																																															
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X-2	T 0 3	20	E		6																																																																																			
1	T 0 1	30,000	U		7																																																																																			
2	T 0 4	73	D		8																																																																																			
3	T 0 4	3	D		9																																																																																			
4					10																																																																																			

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Line 2 - 73 TPH Design - Spent lead-acid storage batteries and battery plant manufacturing scrap are processed at the GNB plant to recycle the metal components and produce lead and lead alloys for the marketplace. Treatment includes breaking the batteries to separate them into components, neutralizing the acid, and smelting and refining the metal bearing materials into finished goods.

Line 3 - 3 TPH Design - Rubber battery case material is transported to the Chemical Waste Management site at Kettleman Hills, CA for disposal.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																	
<div style="display: flex; justify-content: space-between;"> W C A D 0 9 7 8 5 4 5 4 1 T/A C </div>													<div style="display: flex; justify-content: space-between;"> W DUP T/A C 2 DUP </div>																	
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																														
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																										
				<div style="display: flex; justify-content: space-between;"> <div>1. PROCESS CODES (enter)</div> <div>2. PROCESS DESCRIPTION (if a code is not entered in D(1))</div> </div>																										
				23	24	25	26	27	28	29	30	31	32	33	34	35	36	27	28	29	27	28	29	27	28	29	27	28	29	
1	D 0 0 2	36,614	T														T	0	1											Closed loop recycle of flue dust - no storage.
2	K 0 6 9	4,643	T														T	0	4											Scrap battery processing - See Item 3 Line 2
3	D 0 0 8	128,000	T														T	0	4											Rubber case material - See Item 3 Line 2
4	D 0 0 8	5,000	T														T	0	4											
5																														
6																														
7																														
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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	C	A	D	0	9	7	8	5	4	5	4	1	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	4	0	0	2	2
55	56	57	58	59	60

1	1	8	1	1	4	8
72	73	74	75	76	77	78

VIII. FACILITY OWNER
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	G	N	B	I	N	C	O	R	P	O	R	A	T	E
17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	

6	1	2	-	6	8	1	-	5	0	0	0
32	33	34	35	36	37	38	39	40	41	42	43

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	P	O	B	O	X	6	4	1	4	0
32	33	34	35	36	37	38	39	40	41	42	43

C	G	S	T	.	P	A	U	L
44	45	46	47	48	49	50	51	52

M	N
44	45

5	5	1	6	4
54	55	56	57	58

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

 ROBERT L. SMITH
 DIRECTOR, WESTERN REGION

B. SIGNATURE



C. DATE SIGNED

7/5/85

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

X. GNB INCORPORATED - LOS ANGELES SMELTER

This plant has the following South Coast Air Quality Management District operating permits.

M 40001	M 34469
M 40002	M 34470
M 40003	M 34471
M 40004	M 34472
M 40005	M 34473
M 40006	M 34474
M 40007	M 34475
M 40008	M 34476
M 40009	M 34477
M 40010	M 34478
M 40011	M 34479
M 40012	M 34480
M 34465	M 34481
M 34466	M 83359
M 34467	M 40649
M 34468	

The following is issued by the California Highway Patrol for transportation of hazardous materials.

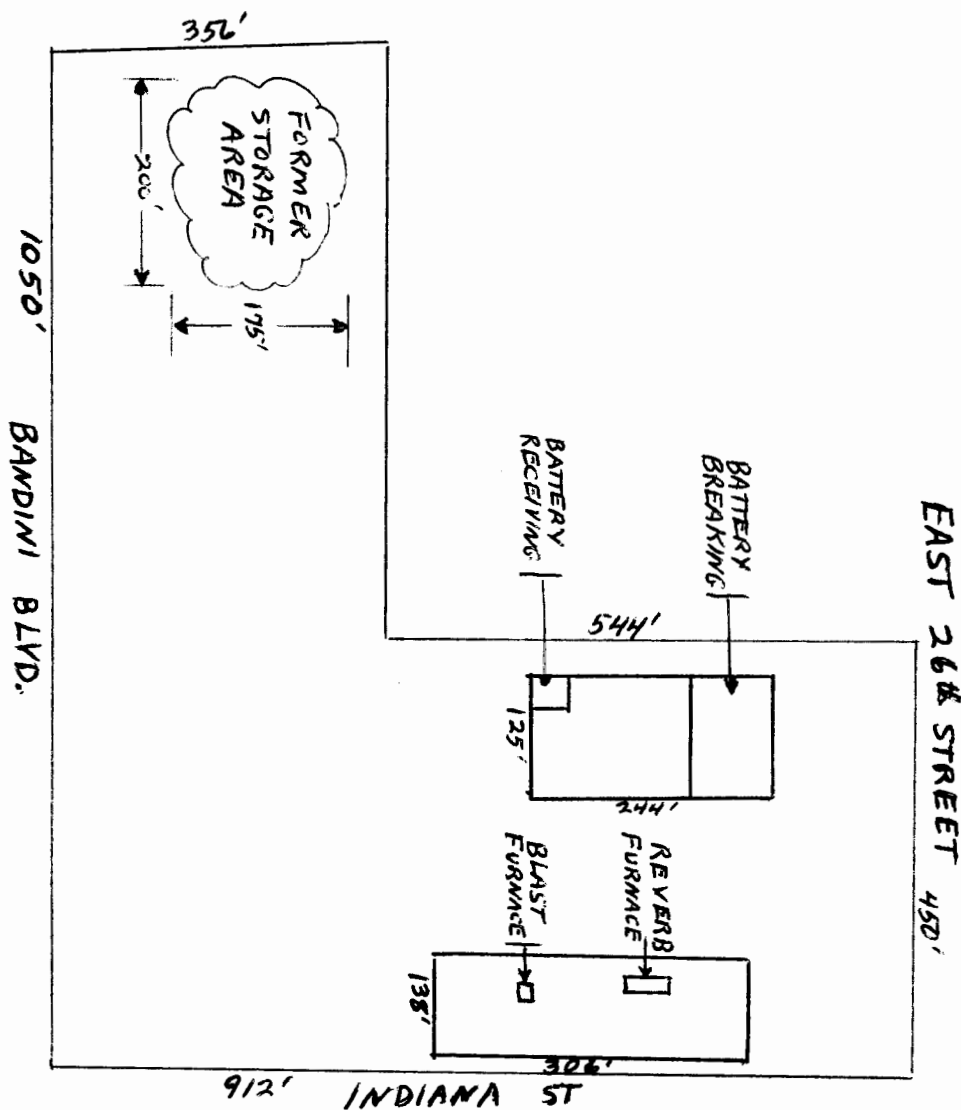
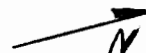
No. 36409

V. FACILITY DRAWING (see page 4)

LOS ANGELES

CAD 097854541

1" = 200'



SCRAP BATTERY PROCESSING IN
RAW MATERIAL PREPARATION SYSTEM
AT LOS ANGELES PLANT OF GNB INCORPORATED

The proprietary and state-of-the-art raw material preparation system (RMPS) at the Metals Division's Los Angeles plant has been designed and constructed to receive scrap batteries either on pallets or loosely loaded in trailers. Trailers loosely loaded are unloaded on a truck dump and palletized loads are unloaded by a mechanized pallet handling system with pallet recovery. The junk batteries are introduced into the RMPS via a large oscillating feeder. *when*

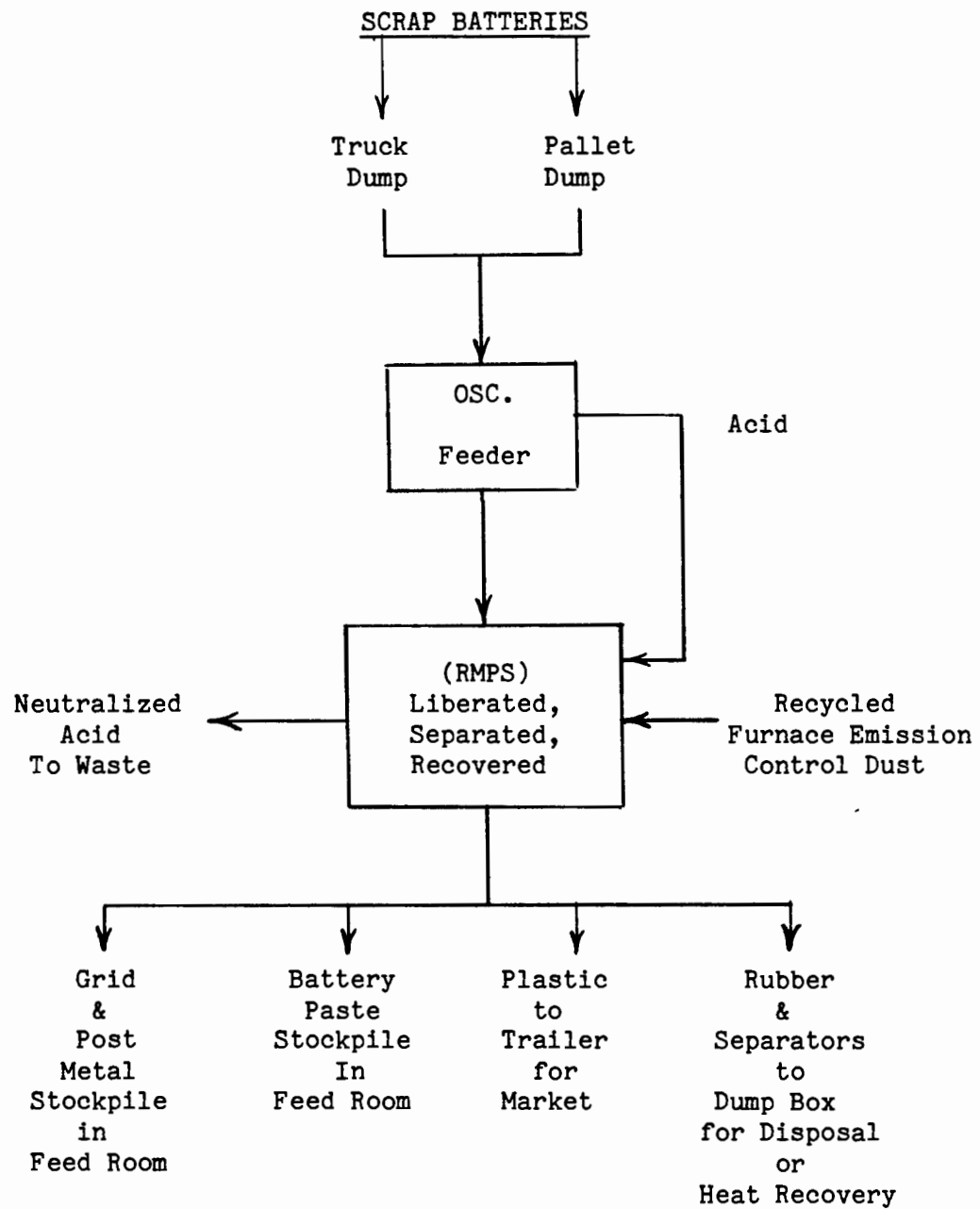
The RMPS is a fully mechanized continuous system which liberates and separates the scrap battery components. The components are individually recovered with very little cross-contamination: grid metal and posts, spent battery paste, separators, plastic and rubber case material, and spent acid. The recovered metal and non-metallic paste are stockpiled separately in a furnace feed room for subsequent efficient pyrometallurgical recovery of lead--as soft lead and lead alloys. Most of these lead products are used to manufacture new lead-acid batteries at GNB battery plants as well as other battery plants.

The RMPS has many metallurgical and environmental-control advantages over conventional battery breaking with saws. Battery acid and process wastewater treatment was designed to be processed as an integral part of the overall scrap battery processing in the RMPS. In addition, all baghouse emission control dusts from pyrometallurgical furnace processing is recycled by being hydraulically transported to the RMPS to be processed along with the spent battery paste for preparation of feed for the reverberatory and blast furnaces. One major benefit gained from the RMPS is very efficient and environmentally controllable furnace operation resulting from the use of consistent and uniform furnace feed. A schematic flow diagram of the RMPS operation is shown in Figure 1 attached.

The other parts of the plant include pyrometallurgical smelting and refining and casting and loading. Environmental control features include metallurgical and ventilation baghouses for servicing over one-half million cubic feet of gases per minute from smelting, refining and RMPS operational areas. Sulfur dioxide emission control is achieved very efficiently with a gas scrubber using soda ash solution for absorption. A new 500,000 gallon per day wastewater and rainwater treatment plant is presently under construction in order to achieve 1987 Clean Water Act requirements. A 2.3 million gallon rainwater retention pond has been installed to collect rainwater from the 15-acre plant site. This retention pond was constructed with a double liner, leak detection system and monitoring wells to assure protection of the underlying ground water.

This state of the art facility is the most environmentally and metallurgically efficient plant in the United States and, perhaps, in the world for processing scrap batteries and other secondary lead feed materials. The investment represented is over \$40 million.

FIGURE 1 - RMPS Process Flow Diagram



fc7L01

pmh

GNB Batteries Inc.

Metals Division

2700 So. Indiana St.
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone: (213) 262-1101

GNB
CAD097854541

July 5, 1985

EPA Region IX
Attn: A-3-2
215 Fremont Street
San Francisco, CA 94105

Dear Sirs:

Attached is Part A of the RCRA Hazardous Waste Permit Application. The Los Angeles plant of GNB Incorporated is a recycler of lead-acid storage batteries and is a generator of hazardous waste, i.e., the rubber battery case material. Under the new RCRA regulations as published in the Federal Register of January 4, 1985, spent lead-acid batteries are to be regulated when stored by the persons reclaiming them. This change in the designation of spent lead-acid batteries makes it necessary for GNB to submit Part A.

Spent lead-acid batteries are recyclable materials to our plant and are the principle source of metal. For this reason some of the process codes and design capacities which were designed for waste treatment do not describe our situation as clearly as they might.

Should you be in need of any further information, please contact me.

Sincerely yours,

Kenneth G. Clark

Kenneth G. Clark
Technical Manager

KGC:mlf

cc: Dept. of Health Services
Hazardous Waste Management Branch

Attach.

That certain portion of Lot 87 of the Rancho Laguna (so called) in the Rancho San Antonio, City of Vernon, as per map marked Exhibit "A" filed in the Superior Court of the State of California in Case No. B-25296, a certified copy of said map being recorded in Book 6387 Page 1 et. seq. of deeds, records of said County, described as follows:

beginning at the intersection of the Southerly line of that certain railroad right of way 20 feet in width conveyed to the Atchison, Topeka and Santa Fe Railway Company and Los Angeles & Salt Lake Railroad Company in and through said small interest, as described in said Record in Book 3691 Page 224, Official Records, of said County, with the Easterly line of Indiana Street as described in Book 1927 Page 83, Official Records; thence South 67 degrees 41 minutes East along the Southerly line of said right-of-way 199.26 feet to the Westerly line of that certain parcel of land described in deed recorded in Book 11695 Page 351, Official Records; thence South 12 degrees 16 minutes 40 Seconds West along said Westerly line 317.30 feet; more or less, to the Northerly line of Bandini Boulevard as described in Book 3860 Page 214, Official Records, thence North 12 degrees 41 minutes West along the Northerly line of said Bandini Boulevard 184.27 feet; thence Northwesterly and Northeast-erly a distance of 23.55 feet measured on the arc of a tangent curve commencing Easterly and having a radius of 15 feet; thence North 12 degrees 16 minutes 30 seconds East along the Easterly line of said Indiana Street 342.31 feet, more or less, to the point of beginning.

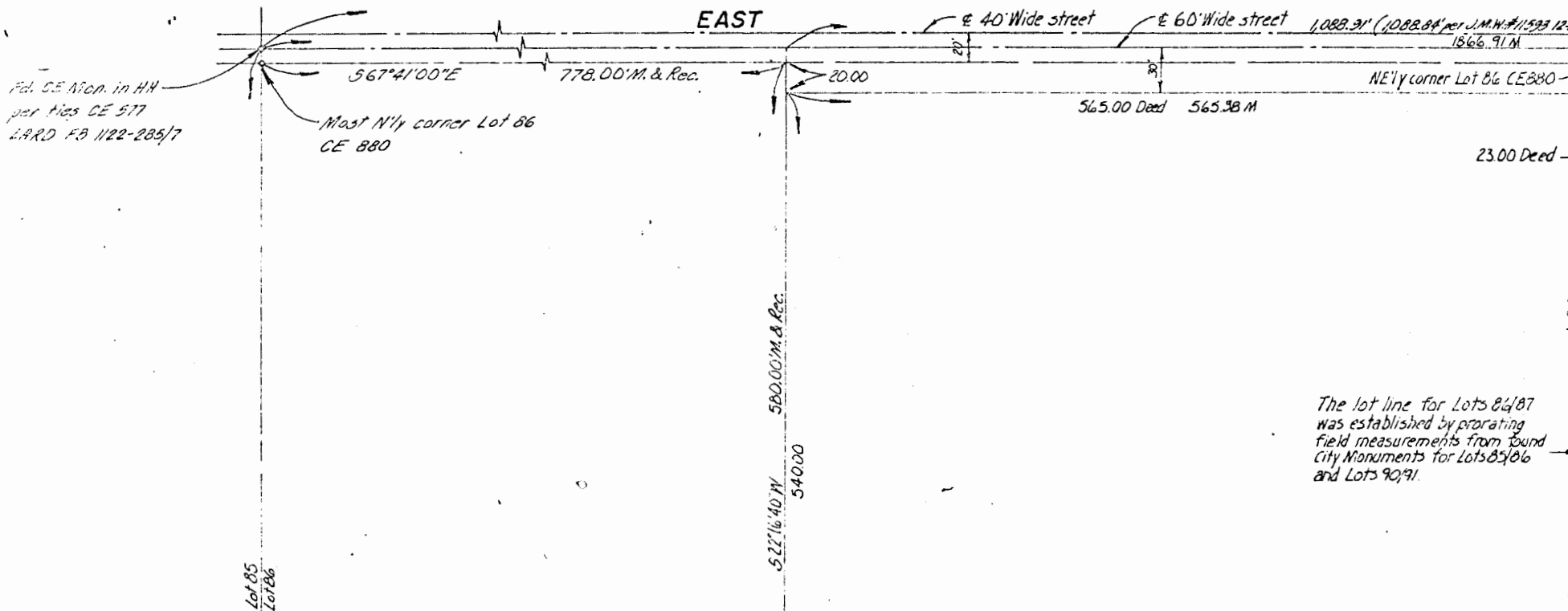
Except therefrom all minerals of any nature whatsoever, including oil, gas and other hydrocarbon substances below a depth of 500 feet from the surface of the earth, without the use of, or any right in or to any portion of the surface of said property to a depth of 500 feet below the surface thereof, as reserved in the deed from Laird Inc., a corporation, recorded November 17, 1955 as Instrument No. 1437.

That portion of Lot 87 of the Rancho Laguna, so-called in the City of Vernon, County of Los Angeles, State of California in the Rancho San Antonio, as delineated on a map entitled "Map of the Rancho Laguna", and thereon marked with the name of Cave J. Coutts, et al., filed as Exhibit "A" in connection with the referees' report in action No. B-25296 of the Superior Court of said County, entitled "Ysidora Coutts Fuller vs. Cave J. Coutts, et al.," and attached to final decree of partition in said action, a certified copy of said decree being recorded in Book 6387 Page 1 et. seq. of deeds, records of said County, more particularly described as follows:

Beginning at the intersection of the Southeasterly line of the 48.00 foot wide strip of land described in the deed to the County of Los Angeles, recorded on June 23, 1933 as Instrument No. 760 in Book 12463 Page 33, Official Records, of said County, with the Southwest-
erly line of 6th Street 60.00 feet wide, as when by deed recorded in Book 3529 Page 83 of Official Records, thence South 67 degrees 11 minutes 00 seconds East, along said 26th Street, 430.54 feet to the beginning of a tangent curve in the boundary of Indiana Street described in deed to the County of Los Angeles, recorded on March 2, 1925 as Instrument No. 832 in Book 3927 Page 83 of Official Records, as being concave westerly and having a radius of 15.00 feet; thence Southerly along said curve, through a central angle of 89 degrees 57 minutes 30 seconds an arc distance of 23.55 feet to the end of said curve; thence South 22 degrees 16 minutes 30 seconds West, along said Indiana Street, 525.01 feet to the Northeasterly line of the 70.00 foot wide strip of land described in the deed to L.A. and Salt Lake Railroad Company recorded on April 8, 1925, as Instrument No. 1834, in Book 3891 Page 124 Official Records, thence North 67 degrees 41 minutes 00 West, along said Northeasterly line, 445.41 feet to said Southeasterly line of the 48.00 foot wide strip of land; thence North 22 degrees 15 minutes 46 seconds East, along said Southeasterly line, 540.00 feet wide to the point of beginning.

Those portions of Lots 86 and 87 of the Rancho Laguna, so called the City Vernon, County of Los Angeles, State of California, in the Rancho San Antonio, as delineated on the map entitled "Map of the Rancho Laguna" and thereon marked with the name of Cave J. Courts et. al., filed as Exhibit "A" in connection with the referee's report in action No. B-25296 of the Superior Court of said County, entitled "Ysidora Courts Fuller vs. Cave J. Courts et., al." as attached to final decree of partition in said action, a certified copy of said decree being recorded in Book 6387 Page 1, et. seq., of Deeds, records of said County, more particularly described as follows:

beginning at the most Northerly corner of said Lot 86, as shown on said Map; thence South 67 degrees 41 minutes 00 seconds East along the Northeasterly line of said Lot 86, a distance of 778.00 feet; thence South 22 degrees 16 minutes 40 seconds West 580.00 feet to point in the Southwesterly line of 20.00 foot right-of-way, recorded in Book 3891 Page 224, Official Records of said County, being the true point of beginning; thence South 67 degrees 41 minutes 00 seconds East, along said Southwesterly line, 1058.91 feet to the Northwesterly line of Indiana Street as described in deed to the County of Los Angeles, recorded on March 2, 1925, as Instrument No. 632 in Book 3927 Page 83 of Official Records; thence South 22 degrees 16 minutes 30 seconds West, along said Indiana Street, 342.29 feet to the beginning of a tangent curve in the boundary of said Indiana Street described as having a radius of 15.00 feet; thence Southwesterly, along said curve, through a central angle of 90 degrees 02 minutes 30 seconds an arc distance of 23.50 feet to the Southerly line of the 10 foot wide strip of land described in deed recorded in Book 54193 Page 316, Official Records and Document No. 2275 recorded June 13, 1970; thence North 67 degrees 41 minutes 00 seconds West, along Bandini Boulevard, 1043.91 feet to the Southwesterly prolongation of said course described above as having a bearing and length of South 22 degrees 16 minutes 40 seconds West 580.00 feet; thence North 22 degrees 16 minutes 40 seconds East 357.30 feet to the true point of beginning.



The lot line for Lots 84/87 was established by prorating field measurements from found City Monuments for Lots 85/86 and Lots 90/91.

GNB Incorporated

Resource Recycling Division

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101
FAX Adm. (213) 269-1906
Gen. (213) 266-1817



September 18, 1993

Chief, Facility Management Branch -- Region III
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, California 91201

Re: H.W.C.A. No. 93/94-006
CONSENT AGREEMENT AND ORDER

Dear Sir:

This letter is sent to fulfill the requirement under paragraph 6.1.32. Verification Submittal, and describes when and how GNB completed each item of corrective action described in paragraphs 6.1.1 through 6.1.31 of the Agreement. Most of the items had already been completed, prior to the signing of the Agreement and are so noted.

6.1.1 Respondent will not maintain hazardous waste piles unless they are in compliance with Title 22, sections 66265.250 through 66265.258.

This item was corrected prior to the signing of the Agreement. Currently, in accordance with the Land Disposal Restrictions, no waste piles are maintained at the Facility. Since the "waste" materials managed at GNB are classified as hazardous (D008) primarily due their lead content, and D008 wastes are restricted from any form of land disposal, lead bearing materials that are not amenable to management in tanks or containers due to their bulk and volume are managed within either the reverb feed room or the blast furnace feed room. These areas are designed and operated in a manner that provides similar containment as that provided by a tank. These areas are being incorporated into the Part B application as regulated units in accordance with the technical standards of 40 CFR 265.1100 - Containment Buildings.

6.1.2 Respondent will handle the following materials in accordance with California law: (1) battery separator case waste, (2) crushed or used drums and (3) crucibles; Respondent will not maintain these materials in unpermitted hazardous waste piles.

DTSC - REGION 3
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SEP 22 1993

FMB - SURVEILLANCE
& ENFORCEMENT

Chief, Facility Management Branch -- Region III

September 18, 1993

Page 2

This item was corrected prior to the signing of the Agreement. Battery separator waste is managed within the reverb feed room. This material is charged to the reverberatory furnace as a reducing agent. Crushed steel drums are managed within the blast furnace feed room. This material is charged to the blast furnace as a fluxing agent, providing part of the iron requirement to the furnace. Crucibles are repaired/reworked and returned to service. Crucibles are not intended for discard, and are therefore not wastes.

6.1.3 When Respondent ships any products, materials, wastes or recyclable materials off its premises, Respondent will ensure that the outgoing trucks or containers do not leak hazardous wastes onto the streets or highways.

This item was corrected prior to the signing of the Agreement. Spent batteries that cannot be managed at the facility (some steel cased batteries, Ni-Cad batteries, etc.) are placed on pallets, stretch-wrapped, and securely banded in place. Slag (a dry, solid material) that is shipped off-site for disposal is placed in a steel roll-off box with a tarp securely covering it. Responsible employees have been trained in the proper management methods for these materials.

6.1.4 Prior to shipping its polypropylene chips off its premises, Respondent will dry them sufficiently to ensure that leachate from these chips does not leak onto the streets or highways.

This item was corrected prior to the signing of the Agreement. Crushed polypropylene battery case material is separated from other components within the raw material processing system (RMPS). These plastic chips are pneumatically conveyed into a trailer. The trailer is staged within the GNB facility where the chips are allowed to air dry. Before leaving the property, each trailer containing plastic chips is washed off at the mobile equipment wash area. Again, the trailer is allowed to air dry before it leaves the site.

6.1.5 Respondent will ship its polypropylene chips under hazardous waste manifest, using a registered transporter, to a Facility which has a Permit or other authorization from the Department allowing it to accept hazardous waste.

This item was corrected prior to the signing of the Agreement. The polypropylene chips are sent to KW Plastics where they are reclaimed to yield pelletized polypropylene, which is subsequently used to manufacture new battery cases. When this material leaves the GNB facility, it is accompanied by a hazardous waste manifest (with applicable Land Disposal Restriction notifications attached). It is transported via a registered transporter (Sanders Trucking). KW Plastics has been issued an EPA ID number (CAD 982435026) and has authorization from the Department to accept the polypropylene chips from GNB.

Chief, Facility Management Branch -- Region III

September 18, 1993

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6.1.6 Respondent will post and maintain signs with the warnings required by Title 22, section 66265.14(c) at the entrance to the active portion of the Facility.

Existing warning signs were posted at the following locations prior to the signing of the Agreement:

- (1) Entrance to the RMPS room
- (2) At the railroad dock
- (3) At each battery storage area

Additional signs with the legend "Danger Hazardous Waste Area -- Unauthorized Personnel Keep Out," have been posted at scale house entrance and at the Indiana Street entrance to the plant. The legend is presented in English and Spanish and is legible from a distance of at least 25 feet.

6.1.7 Respondent will make emergency arrangements with emergency response agencies, including local police and fire departments and local hospitals, as required by Title 22, section 66265.37.

This item was corrected prior to the signing of the Agreement. Copies of letters sent out to police, fire departments, emergency response teams and the local Office of Emergency Services are on file at the GNB facility. Attached to each letter was a brief description of the facility and processes along with a site plan. As the Contingency Plan is updated, new letters will be sent out, copies of which will be maintained on-site. An example of the type of letter to be sent out with the updated Contingency Plan is attached as Exhibit 1.

6.1.8 Respondent will develop and follow a waste analysis plan which identifies the components of its waste streams, as required by Title 22, section 66265.13(b).

This item was corrected prior to the signing of the Agreement. A waste analysis plan was developed as part of the original Part B application submittal in November 1988 and subsequently revised in February 1991 and June 1992. It can be found in Section 5 of the Part B application and is maintained on-site. Documentation as to its implementation is initiated at the scale house and ultimately filed in the Environmental Clerk's Office. As allowed by 22 CCR 66265.13(a)(2)(B), GNB solicits the required information from the supplier (e.g., generator) of the lead bearing raw materials (e.g., hazardous waste). An example of the letter used to obtain the generator's certification is attached as Exhibit 2. The letter also lists what materials are acceptable for lead reclamation at GNB's Resource Recycling facility.

6.1.9 Respondent will maintain an adequate inspection schedule and inspection log, including during periods when its environmental clerk is on vacation, as required by Title 22, section 66265.15(d).

This item was corrected prior to the signing of the Agreement. The inspection schedule can be found in Section 8.3 of the Part B application. The inspection log sheets are filled out by the Environmental Clerk. When person filling this position is not available, a designated individual is responsible for recording the inspection findings. The inspection log sheets are maintained at the facility (in the Environmental Clerk's Office) for at least three years from the date of inspection. The inspection log includes the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

6.1.10 Respondent will maintain a Contingency Plan which complies with the provisions of Title 22, sections 66265.51 and 66265.52, and contains, without limitation, (1) a specific description of actions to be taken by company personnel in an emergency, (2) a description of arrangements with emergency response agencies, (3) a listing of all emergency equipment, with a description of the location and capability of each item, (4) a legible evacuation plan which describes the signals to be used to begin evacuation, and (5) the name of the primary and all alternate emergency coordinators.

This item was completed prior to the signing of the Agreement. A copy of the Contingency can be found in Section 10 of the Part B application. Copies of the plan are maintained at the facility (locations are listed in the plan) and with the Environmental Manager, the Plant Manager, the Furnace Department Head, the Environmental Chemist, the Maintenance Manager, the Engineering Manager, and the Safety Manager. The persons filling these positions also serve as primary and alternate emergency coordinators on a rotating schedule which is posted in each office. The plan presents a description of actions to be taken by plant personnel in general terms and for specific types of incidents. It documents the arrangements made with emergency response agencies. Section 10. lists the required emergency response equipment information. Evacuation routes for each department are presented. Portable compressed air type horns are present in each control center for use in a facility wide emergency for notifying personnel to begin evacuation. This plan is routinely reviewed to keep it up to date. The most recent review and revision began in August 1993 and will be distributed to appropriate emergency response and regulatory agencies upon its completion (estimated completion date September 24, 1993).

6.1.11 Respondent will maintain a closure plan which complies with the provisions of Title 22, section 66265.112 and, without limitation, details the equipment and methods for testing contaminated soil.

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This item was completed prior to the signing of the Agreement. A closure plan was developed as part of the original Part B application submittal in November 1988 and subsequently revised in February 1991 and June 1992. It can be found in Section 13 of the Part B application and is maintained on-site. The plan was edited in September of 1993 to include details on the equipment and methods for testing for contaminated soil. The revised closure plan will be distributed to appropriate regulatory agencies upon its availability (estimated delivery date is October 4, 1993).

6.1.12 Respondent will maintain a closure cost estimate, as required by Title 22, section 66265.142.

This item was completed prior to the signing of the Agreement. A closure cost estimate was developed as part of the original Part B application submittal in November 1988 and subsequently revised in February 1991 and June 1992. It can be found in Section 14 of the Part B application and is maintained on-site. The cost estimate is adjusted annually for inflation. The new amount is reflected in the financial assurance instrument.

6.1.13 Respondent will maintain a training program which complies with Title 22, section 66265.16.

This item was completed prior to the signing of the Agreement. A hazardous waste training program was developed as part of the original Part B application submittal in November 1988 and subsequently revised in February 1991 and June 1992. It can be found in Section 9 of the Part B application and is maintained on-site.

6.1.14 Respondent will maintain accumulation dates on pallets of batteries, as required by Title 22, section 66266.81(a)(7)(D).

This item was completed prior to the signing of the Agreement. A bold-face, permanent marker is used to legibly and conspicuously apply the date of receipt to each pallet of batteries placed in storage at the GNB facility.

6.1.15 Respondent will file a Notice of Discrepancy in the event that it receives waste from a foreign generator under a manifest that is incomplete, as required by Title 22, section 66265.72.

In the event that GNB receives lead-bearing material (e.g., "waste") from a foreign generator under a manifest that is incomplete, GNB agrees to file a Notice of Discrepancy with the Department. Upon discovering a significant discrepancy (as defined in 22 CCR 265.72), GNB will attempt to reconcile the discrepancy with the supplier and/or transporter by telephone. If the discrepancy cannot be resolved within 15 days after receipt of the

material, GNB will immediately send a letter to the Department describing the discrepancy and attempts made to resolve it, and a copy of the manifest and/or shipping papers at issue.

6.1.16 Respondent will maintain an operating record, which, without limitation, cross-references the storage location of hazardous waste received under manifest with the appropriate manifest document numbers, as required by Title 22, section 66265.73(b)(2).

This item was completed prior to the signing of the Agreement. Current practice for the receipt of lead-bearing material received under manifest (e.g., hazardous "waste"), is to immediately place the material into process within the blast furnace feed room. If this is not possible for any reason, GNB does and will maintain a record which indicates into which bin the material was placed for storage. The permitted container storage areas at the facility have individual "bins", or sub-areas, that have been labelled with numbers. The record thus reflects material storage location by bin number. See Exhibit 3.

6.1.17 Respondent will maintain training records which satisfy the provisions of Title 22, sections 66265.16(d) and (e) and include, without limitation, a showing that employees handling hazardous wastes (including, without limitation, slags, drosses and polypropylene chips) have received training within six months of beginning employment.

This item was implemented prior to the signing of the Agreement. Documentation that shows that new employees have received and completed the required training within six months of beginning employment is maintained in the office of the Safety Manager. An example of one type of training documentation is presented as Exhibit 4.

6.1.18 Respondent will refrain from charging the reverberatory furnace with rubber chips in excess of those needed as a reducing agent.

This item was implemented prior to the signing of the Agreement. When batteries are processed through the RMPS, the individual components are segregated. The rubber chips/battery separator fluff, the main elemental component of which is carbon, are charged to the furnace as a substitute for coke which is necessary as a reducing agent. Only that amount of rubber chips necessary to yield a reducing environment in reverberatory is charged to the furnace. Occasionally, if not enough rubber chips are available, coke is added to the furnace. No rubber chips/separator fluff is received from offsite.

6.1.19 Respondent has cleaned its Engineering and Laboratory Building and, as required by Title 22, section 66265.173, will ensure that it does not contain open, unlabelled containers of hazardous wastes.

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September 18, 1993

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This item was completed prior to the signing of the Agreement. The building is completely cleaned and vacant.

6.1.20 Respondent has cleaned its Sampling Lab and will keep the floor of this area free of lead granules.

This item was implemented prior to the signing of the Agreement. The Sampling Lab has been cleaned. A designated employee has been assigned the responsibility of maintaining the area, including its floor, free from debris (e.g., lead granules).

6.1.21 Respondent will manage broken and leaking batteries as hazardous waste and shall, without limitation, store damaged batteries inside closed containers, as required by Title 22, section 66265.81(b)(1).

This item was implemented prior to the signing of the Agreement. Loads of incoming batteries are inspected at the gate. Only non-leaking batteries secured to pallets are placed in storage. If any batteries are found to be leaking, they are immediately unloaded into process. If, upon inspection of an incoming load, it is observed that the batteries were improperly loaded, resulting in numerous overturned batteries, GNB may refuse the load and inform the supplier that only batteries loaded and transported in accordance with 22 CCR 66266.81(b)(1) will be accepted at the facility.

GNB is currently encouraging its suppliers of batteries to switch to re-usable, reinforced, plastic boxes (with approximately the same capacity as one pallet of batteries) for shipping spent batteries. The boxes accommodate lids and would contain any leaking batteries.

6.1.22 Respondent will take precautions necessary to ensure that it does not accept metallic sodium waste.

This item was implemented prior to the signing of the Agreement. Loads of incoming materials are visually inspected to determine whether the contents match the description on the manifest or shipping papers and to ensure that the material is on GNB's list of acceptable materials. These procedures are described in Section 5 of the Part B application. As drummed material is unloaded into process within the blast furnace feed room, the contents is further inspected to ensure that deleterious materials are not charged to the furnace.

6.1.23 Respondent will (i) properly handle its wastewater treatment filter media as a hazardous waste and (ii) will place this material inside closed containers from which there will be no leaks onto the ground or the Facility substrate, as required by Title 22, section 66265.31.

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This item was implemented prior to the signing of the Agreement. Wastewater treatment filter media is initially transferred from the sand filters into an appropriate container. This material is then immediately transferred into process within the blast furnace feed room.

6.1.24 Respondent will maintain containers of hazardous waste, including, without limitation, lead dross and batteries, properly labelled, free from leaks and securely closed, except when necessary to add or remove material from such containers, as required by Title 22, sections 66265.171 and 66266.81(b)(1).

This item was initiated prior to the signing of the Agreement. Lead dross from the refinery kettles is skimmed off into steel boxes. The dross is removed from kettles of molten lead and is likewise, at a high temperature when first placed in the steel box. The boxes are managed within a designated area of the refinery department, inside the building. Due to the high temperature, a "tight" lid cannot be placed on the box. A loose cover is placed over the box in order to meet the requirements of 22 CCR 66265.171. Again, due to the heat of the dross, a labelled cannot be applied to the box. A sign is maintained at the boundary of the designated area and contains the information that would otherwise appear on a label. When the dross is cool enough, and before it is moved to any other storage area, a label is affixed to the box and it is securely covered.

Loads of incoming batteries are inspected at the gate. Only non-leaking batteries secured to pallets are placed in storage. If any batteries are found to be leaking, they are immediately unloaded into process. If, upon inspection of an incoming load, it is observed that the batteries were improperly loaded, resulting in numerous overturned batteries, GNB may refuse the load and inform the supplier that only batteries loaded and transported in accordance with 22 CCR 66266.81(b)(1) will be accepted at the facility.

6.1.25 Respondent will store hazardous waste including, without limitation, waste batteries and waste bundles received from K W Plastics, only in areas which are authorized under its Interim Status Document or Permit.

This item was initiated prior to the signing of the Agreement. GNB stopped accepting any material from KW Plastics prior to the signing of the Agreement. Drummed hazardous "waste" (e.g., recyclable lead-bearing materials) from other offsite suppliers are stored only in designated areas as described in the Part B application.

6.1.26 Respondent will conduct regular inspections of the rainwater retention pond located at the south end of its Facility.

This item was initiated prior to the signing of the Agreement. The primary responsibility for the inspections rests with the Environmental Chemist. The rainwater retention pond is regularly inspected both when it is full and when it is empty. An example of the inspection log for the rainwater retention pond is attached as Exhibit 5.

6.1.27 Respondent will submit a written report to the Department within 15 days after any fire or other emergency requiring the implementation of the Contingency Plan, as required by Title 22, section 66265.56.

GNB agrees that within 15 days of an incident which necessitated the implementation of emergency procedures described in the Contingency Plan, GNB will send a written report to the Department which will include the information specified under 22 CCR 66265.56(j). This requirement is described in the Contingency Plan. Table 10.10 in the plan lists the information that would be supplied.

6.1.28 Respondent will maintain Land Disposal Restriction notifications for wastes received, as required by Title 22, section 66265.73(b)(9).

This item was initiated prior to the signing of the Agreement. The only materials accepted at the facility are those which are amenable to lead reclamation. However, as required by 22 CCR 265.73(b)(9), a copy of the LDR notice which accompanies each shipment of hazardous "waste" received at the facility is maintained in the Environmental Clerk's Office. An example is attached as Exhibit 6. No lead-bearing material (e.g., "wastes") received at the GNB facility are managed in land disposal units.

6.1.29 Respondent will maintain copies of Land Disposal Restrictions for hazardous wastes shipped offsite, as required by Title 22, section 66268.7.

This item was initiated prior to the signing of the Agreement. A copy of the Land Disposal Restriction notice used for hazardous wastes (e.g., blast furnace slag) shipped offsite is attached as Exhibit 7.

6.1.30 Respondent will maintain aisle space, as required by Title 22, section 66265.35, including, without limitation, in the battery storage yard.

This item was initiated prior to the signing of the Agreement. Within the permitted storage areas, aisle space of at least 18 inches is and will be maintained along all walls. Pallets of batteries and/or drummed material will be arranged four pallets across with at least 18 inches of aisle space between every four pallets. As a separate issue, temporary palletized storage of batteries in the west yard was authorized by the Department with the same 18 inch aisle space implementation. Currently, the only battery storage in the west yard takes place in trailers. Aisle space sufficient to allow the movement of tractors and forklifts is

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maintained and is also more than adequate for inspection and emergency response. A more permanent off-site method for battery storage is currently under evaluation.

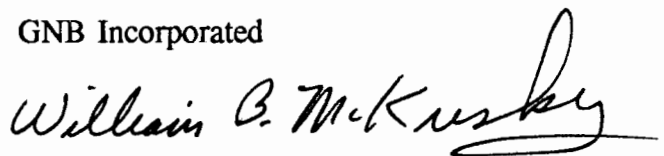
6.1.31 Respondent will maintain containers of recyclable materials labelled with the words "Excluded Recyclable Material" and any other language required by HSC sections 25143.2 and 25143.9.

This item was completed prior to the signing of the Agreement. Containers of recyclable materials that are not classified as RCRA or California hazardous waste (for example, dross generated from GNB's refinery kettles and recycled on-site) are appropriately labelled. The label also includes a warning that the material contains lead and must be managed by personnel equipped with the proper personal protection equipment.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

GNB Incorporated



William B. McKusky
Environmental Manager

WBM:klb

490.4

490-930917CHIE.MCK

Chief, Facility Management Branch -- Region III
September 18, 1993
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Attachments:

- Exhibit 1 Letter to Emergency Responders
- Exhibit 2 Generator's Certification Letter
- Exhibit 3 Designated Container Storage Areas
- Exhibit 4 Acknowledgement of New Hire Orientation
- Exhibit 5 Rainwater Retention Pond Inspection Log
- Exhibit 6 LDR Notice for Wastes Received Offsite
- Exhibit 7 LDR Notice for Wastes Shipped Offsite

cc: Dennis A. Ragen
 Deputy Attorney General
 110 West A Street, Suite 700
 P.O. Box 85266
 San Diego, California 92186-5266

Mr. Edward L. Puckett, General Manager, Resource Recycling Division

Mr. Richard Crowell, Director, Environmental Development

Mr. Richard Thompson, Environmental Engineer

GNB Incorporated

Resource Recycling Division

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101
FAX Adm. (213) 269-1906
Gen. (213) 266-1817



(Address)

Gentlemen:

In compliance with rules and regulations of the California Department of Toxic Substance Control, this letter is to give notice that GNB Incorporated operates a manufacturing plant that handles material classified as hazardous waste. This site also includes an on-site waste treatment facility.

GNB is obligated to maintain an Emergency Contingency Plan on site to be used in the event of an emergency. Enclosed is our revised Emergency Contingency Plan. Please pass it on to the responsible authority in your agency.

We would like to invite a representative (s) of your agency to meet with us at your convenience to familiarize yourself with our operation. If a personal visit is not necessary a written response would be greatly appreciated.

Thank you for your assistance.

Sincerely,

GNB Incorporated

Ralph Kafka
Health And Safety Manager

May 27, 1992

Raw Material Supplier
Address
City, State

Re: Generator Certification

Dear :

GNB Incorporated is subject to regulation under the California Code of Regulations and the federal Resource Conservation and Recovery Act (RCRA) as a treatment, or storage facility for hazardous waste. As part of the Waste Analysis Plan required by CCR 66245.13 and 40 CFR 265.13 under those laws, GNB is asking raw material suppliers to certify that only materials from a GNB approved list will be sent to this facility for recovery. GNB may only receive the following materials:

- Whole lead-acid storage batteries or component parts
- Lead-bearing materials (plant scrap) from lead-acid battery manufacturing, lead oxide manufacturing, and lead smelting industries:

- Acid dump/fill solids
- Air filter bags and cartridges
- Baghouse bags
- Battery covers with posts
- Battery grids, posts, and separators
- Charging jumpers and clips (with insulated wire removed)
- Cheesecloth from pasting rollers
- Emission control dust
- Lead oxide and lead oxide residues
- Lead plates and groups
- Pasting belts
- Purchased drosses

Generator Certification Letter

May 27, 1992

Page 2

Scrap metal
Slag
Sump mud
Sweepings
Wastewater treatment filter press cloth

Other lead-bearing materials may be accepted on a case by case basis - *call for approval prior to shipment* - and will require completing the attached recyclable material profile form. Materials requiring prior approval include:

Acid filters
Battery electrolyte (sulfuric acid)
Emission control sludges, filter cakes, residues and solids
Lead based pigments and compounding agents
Shop abrasives
Water treatment sludges, filter cakes, residues and solids

Additional restrictions on materials which can be accepted must also be imposed to protect facility employees and the environment. For the same reason, GNB will not accept any authorized materials which are contaminated with waste oils, asbestos, PCBs, aluminum, mercury, solvents, sodium or any waste contaminants other than indigenous lead-acid battery materials or lead alloying metals (arsenic, antimony, etc.). It is the responsibility of the supplier to ensure that only authorized materials are shipped.

Except for whole, undamaged lead-acid batteries, materials listed above must be received under hazardous waste manifest together with a Land Disposal Restriction Certification (see attached form) *with each shipment*. The materials listed above will be accepted when packaged in accordance with DOT shipping requirements. We ask that, wherever possible, you eliminate or minimize the use of stretch wrap.

GNB is prohibited from charging certain material to our furnaces by California's South Coast Air Quality Management Division. Material that is *not* acceptable includes but is not limited to:

Asphalt paving materials
Battery cases, covers without posts, vents, buttons, separators
Clothing (e.g. coveralls, aprons, shoes, hats, gloves, etc.)
Contaminated pallets

Generator Certification Letter

May 27, 1992

Page 3

- Fluff from lead wire and cable casings
- Paper hand towels
- Pasting additive bags
- Platen abrasive
- Respirators and cartridges
- Spent laboratory chemicals
- Stacking boards
- Waste shipping containers (e.g. cartons, bags, drums, cardboard, etc.)
- Wiping rags and sponges

Only those shipping containers and pallets used directly for the shipment of raw materials will be acceptable.

Only those battery cases, covers, vents, and separators that arrive as components of a battery or battery plates and groups will be acceptable. Segregated cases, covers without posts, vents, buttons, and separators should be shipped directly to a plastics reclamation facility, or otherwise properly disposed.

If inspection at GNB determines that materials from your facility are not acceptable based upon the above criteria, GNB has no choice but to repackage the material and arrange for proper disposal at an appropriate hazardous waste disposal facility. The cost for this disposal will be billed to your company.

We hope that you understand the regulatory environment in which our facility must operate and the need for these guidelines to protect our employees and the environment. We thank you for your cooperation and ask that you certify below that you have read the above restrictions and will abide by them. Please return an original signed copy of this letter to us within 15 days of receipt of this letter.

Sincerely,
GNB Incorporated

William B. McKusky
Environmental Engineer

Attachments

490.4 490-92(PARTBLT.F10

GENERATOR CERTIFICATION

The undersigned has read and understands the requirements set forth in the attached letter and agrees to send to the GNB Incorporated facility in Vernon, California only those materials which conform with these restrictions. We, the undersigned, understand that GNB may reject any shipment containing unacceptable material(s) or, if necessary, dispose of the unacceptable materials at an appropriate hazardous waste disposal facility. We, the undersigned, agree to bear any costs associated with such off-site disposal including analysis, transport, treatment, disposal fees, penalties and/or fines.

Company

Signature

Name and Title

Address

Date

EPA I.D. Number

GNB INCORPORATED
LAND DISPOSAL RESTRICTIONS CERTIFICATION

Attach to Hazardous Waste Manifest Number: _____

Attach Available Analytical Data

I certify that the material(s) described on the attached Hazardous Waste Manifest are sent to GNB Incorporated, Vernon, California for *RECYCLE ONLY*.

Should this material be disposed of in any other manner, it is subject to the following treatment standards as prescribed under CCR 66268 and 40 CFR 268 (check all that apply):

40 CFR 268.41 TREATMENT STANDARDS EXPRESSED AS CONSTITUENT CONCENTRATIONS IN WASTE EXTRACT

- ☐ D008 - Non Wastewaters 5.0 mg/l Lead
- ☐ K069 (Calcium Sulfate Subcategory) Non Wastewaters 0.14 mg/l cadmium
0.24 mg/l lead

268.42 TREATMENT STANDARDS EXPRESSED AS SPECIFIC TECHNOLOGIES

- ☐ D002 Acid Subcategory
DEACT: deactivation to remove hazardous characteristic due to its corrosivity.
- ☐ D003 Non Wastewaters (reactive - when mixed with water, generates toxic gases)
DEACT: deactivation to remove hazardous characteristic due to its reactivity.
- ☐ D008 Lead acid batteries (Note: this standard only applies to lead acid batteries that are identified as RCRA hazardous wastes and that are not excluded elsewhere from regulation under the land disposal restrictions of 40 CFR 268 or exempted under other EPA regulations - see 40 CFR 266.80).
RLEAD: thermal recovery of lead in secondary lead smelters
- ☐ K069 Emission control dust/sludge from secondary lead smelting:
Non calcium sulfate subcategory. Non wastewaters.
RLEAD: thermal recovery of lead in secondary lead smelters

40 CFR 268.43 TREATMENT STANDARDS EXPRESSED AS CONSTITUENT CONCENTRATIONS IN WASTES

- ☐ D008 Wastewaters 5.0 mg/l lead

Signature

Name and Title

Date

40 CFR 268.43 GNB 070

GNB INCORPORATED
RECYCLABLE MATERIAL PROFILE

GENERAL INFORMATION

1. Generator Name: _____ USEPA Generator ID # _____
2. Generator Address: _____ Billing Address: _____

3. Technical Contact/Phone: _____
Alternate Contact/Phone: _____
Billing Contact/Phone: _____

PROPERTIES AND COMPOSITION

4. Process Generating Waste: _____
5. Waste Name: _____
6. a. Is this a California Hazardous Waste (CCR66261)? ☐ Yes ☐ No
b. Identify all applicable California waste codes: _____
7. a. Is this a USEPA Hazardous Waste (40 CFR 261)? ☐ Yes ☐ No
b. Identify all USEPA listed and characteristic waste code numbers (D, F, K, P, U): _____
8. Physical state: ☐ Liquid ☐ Solid ☐ Both
☐ Singlelayer ☐ Multilayer
☐ Free Liquid Range ____ to ____ %
9. pH range _____ or not applicable _____
10. Strong odor? Describe _____
11. Liquid flash point: _____ or not applicable _____
12. Chemical composition: List all known constituents present in any concentration:
Attach analytical reports where available.

_____	to	%
_____	to	_____
_____	to	_____
_____	to	_____
_____	to	_____
_____	to	_____
_____	to	_____
Total composition (must equal or exceed 100%) _____		

13. Is this material listed on Appendix XI of 40 CFR 266? ☐ Yes ☐ No
If not, provide: Total toxic organic constituents: _____ ppm
Heating Value _____ Btu/lb

I certify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification. I believe that the information I submitted is true, accurate, and complete. I agree to bear responsibility for any waste which does not conform to the above description.

Signature

Name and Title

Date

For GNB Use Only _____

☐ This material is acceptable for recycle

Prior California EPA Approval Required

☐ Yes

☐ No

☐ This material is not acceptable for recycle

Comments:

Signature

Name and Title

Date

Inter-Office Memo



To Supervisors & Mgrs. From R. Smith, Jr.

Dept./Div. RRD\ENV

Date 9-07-93

Location ENV./LARRD

Subject Designated Container Storage Areas

Copies to J. Littleton
W. McKusky
File

The plant has 5 Regulated Container Storage Areas.

1. Battery Storage Building (Bins 106, 107, 108)
2. Battery Storage Building (Bins 104, 105)
3. Battery Storage Building (Bin 103)
4. Battery Storage Building (Bins 101, 102)
5. West Yard (Trailerred batteries only)

The areas listed above are to be used for storage of containerized materials. While materials are being transferred to process, being put into process, being sampled or going through the shipping or receiving process, they may be out of these Regulated areas. Otherwise containerized materials or containers that once were used for materials must remain in one of the above listed areas.

R. Smith, Jr.



ACKNOWLEDGEMENT OF NEW HIRE ORIENTATION

ON _____ I, _____ WAS
GIVEN THE GNB NEW HIRE ORIENTATION PRIOR TO REPORTING TO MY
WORK PLACE. THE FOLLOWING ITEMS OF INSTRUCTION WERE GIVEN TO
AND UNDERSTOOD BY ME:

1. Emergency Contingency Plan.
2. Right To Know / Hazardous Communication.
3. Emergency Evacuation Procedures.
4. Hazwoper.
5. Confined Space.
6. Lock Out / Tag Out.
7. Fire Extinguisher Training.
8. GNB Illness & Injury Prevention Program.
9. Cadmium Standard.
10. Affects Of Lead On Reproduction. (Video)
11. Bloodborn Pathogens.
12. Lead Standard. (Video)
13. Respirator Training / Personnal Protective Equipment.
14. GNB Operations Overview. (Video)
15. Safety Programs and Procedures.
16. Accident Reporting.
17. Personal Hygene.
18. Vehicle Training Program.
19. Plant Rules of Conduct.
20. Hearing Protection. (Video)
21. Handling Hazardous Material. (Video)
22. Protecting Your Back. Ergonomics. (Video)

Trainer

Employee

copy

DAILY RAINWATER RETENTION POND LOG

MONTH:

DATE	METER READING	POND LEVEL	PUMP ON/OFF	MAN HOLE LEVEL INFECTION	SIGN
5-1-93	36946 =	80%	OFF	3"	ET
5-2-93	38109 = 1263	80%	OFF		CG
5-3-93	39211 = 1102	80%	ON	NEED REP	ET
5-4-93	39457 = 0246	80%	OFF		CG
5-5-93	39933 = 4760	80%	OFF	Made work order for new pump	ET
5-6-93	40501 = 5680	80%	OFF	MARCO'S going to fix pump	ET
5-7-93	40886 = 3850	80%	ON	2 pumped out	ET
5-8-93	41839 = 3489	70%	OFF	2"	CG
5-9-93	42757 = 9180	75%	OFF		ET
5-10-93	43764 = 10070	75%	OFF	OFF	ET
5-12-93	44263 = 34183	70%	OFF		CG
5-14-93	45434 = 11710	70%	OFF	OFF	ET
5-15-93	46218 =	70%	OFF	ON	ET
5-17-93	50004 = 03786	65%	ON	5" pumping out	W
5-18-93	50058 = 546	65%	ON	Pump ON	ET
5-19-93	50104 = 4600	60%	ON	OFF	ET
5-20-93	50307 = 2030	60%	ON	OFF	ET
5-21-93	50636 = 3290	60%	ON	Pump ON	ET
5-22-93	51337 = 7010	45%	OFF	OFF	ET
5-23-93	51922 = 0585	40%	ON	Pump on	CG
5-24-93	53499 = 15770	35%	ON	pump on	W
5-25-93	53701 = 2060	35%	ON	pump on	W
5-26-93	54187 = 4860	35%	ON	pump off	ET
5-27-93	54456 = 2690	30%	OFF	3' pump out	ET
5-28-93	54549 = 430	25%	OFF	OFF	ET
5-29-93	55663 = 11140	20%	OFF	OFF	ET
5-31-93	58132 = 14690	15%	ON	Pumping out	W

51337
 50636
 70
 53499
 51922
 53701
 53499
 54456
 54187
 159

GNB INCORPORATED
LAND DISPOSAL RESTRICTIONS CERTIFICATION

Attach to Hazardous Waste Manifest Number: _____

Attach Available Analytical Data

I certify that the material(s) described on the attached Hazardous Waste Manifest are sent to GNB Incorporated, Vernon, California for *RECYCLE ONLY*.

Should this material be disposed of in any other manner, it is subject to the following treatment standards as prescribed under CCR 66268 and 40 CFR 268 (check all that apply):

40 CFR 268.41 TREATMENT STANDARDS EXPRESSED AS CONSTITUENT CONCENTRATIONS IN WASTE EXTRACT

- ☐ D008 - Non Wastewaters 5.0 mg/l Lead
- ☐ K069 (Calcium Sulfate Subcategory) Non Wastewaters 0.14 mg/l cadmium
0.24 mg/l lead

268.42 TREATMENT STANDARDS EXPRESSED AS SPECIFIC TECHNOLOGIES

- ☐ D002 Acid Subcategory
DEACT: deactivation to remove hazardous characteristic due to its corrosivity.
- ☐ D003 Non Wastewaters (reactive - when mixed with water, generates toxic gases)
DEACT: deactivation to remove hazardous characteristic due to its reactivity.
- ☐ D008 Lead acid batteries (Note: this standard only applies to lead acid batteries that are identified as RCRA hazardous wastes and that are not excluded elsewhere from regulation under the land disposal restrictions of 40 CFR 268 or exempted under other EPA regulations - see 40 CFR 266.80).
RLEAD: thermal recovery of lead in secondary lead smelters
- ☐ K069 Emission control dust/sludge from secondary lead smelting:
Non calcium sulfate subcategory. Non wastewaters.
RLEAD: thermal recovery of lead in secondary lead smelters

40 CFR 268.43 TREATMENT STANDARDS EXPRESSED AS CONSTITUENT CONCENTRATIONS IN WASTES

- ☐ D008 Wastewaters 5.0 mg/l lead

Signature

Name and Title

Date

California Land Disposal Restriction Notice and Certification

Generator Name	Manifest Number
California hazardous waste Code(s)	

This Form is submitted to _____ in accordance with the requirements of CCR Title 22, Chapter 30, Article 40 which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box (boxes A, through D.) below to indicate how my waste must be managed to conform to the land disposal restrictions. A copy of all applicable treatment standards and waste analysis data, where available, is maintained at the GNB Battery Technologies facility identified on the manifest referenced above. If the waste is not a RCRA regulated hazardous waste, I have also entered the appropriate California Waste Code and checked the appropriate box in the table below to indicate the applicable non-RCRA hazardous waste listing from 22 CCR Section 67702.

Complete This table For Non-RCRA, California Regulated Hazardous wastes Only			
Line Item	Check Here	Restricted waste Description	Reference CCR Title 22
1		Metal-containing aqueous waste that contains any of the metals or metal compounds identified in 22 CCR 66699(b).	67702(b)(1)
2		Wastes containing polychlorinated biphenyls (PCBs).	67702(b)(2)
3		[reserved]	
4		[reserved]	
5		[reserved]	
6		[reserved]	
7		Metal-containing solid waste that contains any of the metals or metal compounds identified in 22 CCR 66699(b).	67702(b)(7)
8		[reserved]	
9		[reserved]	
10		Aqueous and liquid organic waste that contain any organic compound measured by EPA Test Methods 8080, 8140, 8150, 8240, and 8270 described in <i>Test methods for Evaluating Solid wastes, Physical/ Chemical Methods, SW-846, Third Edition.</i>	67702(b)(10)
11		Solid hazardous wastes that contain any organic compound measured by EPA Test Methods 8080, 8140, 8150, 8240, and 8270 described in <i>Test methods for Evaluating Solid wastes, Physical/ Chemical Methods, SW-846, Third Edition.</i>	67702(b)(11)

- ☐ **A. RESTRICTED WASTE REQUIRES TREATMENT**
 I am the generator of the waste identified above which must be treated to meet the applicable treatment standards set forth in CCR Title 22, Chapter 30, Article 41 prior to land disposal.
- ☐ **B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS**
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in CCR Title 22, Chapter 30, Article 41 without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."
- ☐ **C. RESTRICTED WASTE SUBJECT TO A VARIANCE**
 The waste identified above is subject to a capacity variance which expires on _____.
- ☐ **D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
"I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in CCR Title 22, Chapter 30, Article 41 without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.		
Signature	Title	Date

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

ATTORNEYS AT LAW

848 CONGRESS AVENUE, N.W.
WASHINGTON, D.C. 20004-4879
FAX (202) 638-8888

ONE CENTURY PLAZA - SUITE 2000
9000 CENTURY PARK EAST
LOS ANGELES, CA 90047-2000
FAX (310) 557-7999

707 THIRD AVENUE
NEW YORK, NY 10017-2015
FAX (212) 715-4000

101 CALIFORNIA STREET - SUITE 2000
SAN FRANCISCO, CA 94111-4000
FAX (415) 397-3000

770 L STREET - SUITE 1100
SACRAMENTO, CA 95814-0000
FAX (916) 445-4000

55 EAST MONROE STREET - SUITE 4200

CHICAGO, ILLINOIS 60603-5903

(312) 345-8000

FAX (312) 350-8888

WEPPERS DIRECT DIAL

CIN _____

INTERNATIONAL

AVENUE LOUISE 800, BOULEVARD
1040 BRUXELLES BELGIUM
TELEPHONE (32) 2 545-4545
FAX (32) 2 545-4545

AFFILIATE FIRMS

MATTHEW THORNTON & CLARK
TORONTO CANADA

MATTHEW MATTHEW & HALLST
MONTREAL AND LEBANON BELGIUM
GOLDON, CANADIAN

February 3, 1993

BY FACSIMILE AND U.S. MAIL

Dennis A. Ragen, Esq.
Deputy Attorney General
State of California
Department of Justice
110 West A Street, Suite 700
P.O. Box 85266
San Diego, California 92186-5266

Re: GNB Incorporated, Metals Division, Vernon, California

Dear Dennis:

I have discussed with GNB management your January 25, 1993 letter to me and have the following responses to your information requests:

1. Describe GNB plans, if any, for installing the proposed material handling system at the Vernon facility

Response: GNB does not presently have a specific schedule for the installation of its proposed new material handling system at Vernon, since it is not yet known whether such a system is commercially practical. It is this very uncertainty which necessitates the proposed research project. It is also impractical to hypothesize an implementation schedule should the research project be successful, since just when the system might be installed at Vernon depends on several variables.

First, GNB plans to give full priority to its electrowinning project in both funding and engineering

BRYFANTE, SHAW, FAIRWEATHER & GERALDSON

Page 2

Dennis A. Ragen, Esq.

February 3, 1993

resources. As we have discussed, this new technology will revolutionize the industry and result in a very dramatic reduction in point source emissions. Its development will also tax the limits of GNB's financial and engineering resources. Only through this all out priority effort and governmental co-funding will it succeed. Although the material handling improvements are expected to significantly reduce fugitive emissions, those reductions will not approach the emission reductions expected through electrowinning. For these reasons, we plan to subordinate the material handling program implementation and cannot now predict when it might occur. We can assure you, however, that we are realists and recognize that California's ever stricter air emission standards will force its implementation in the not too distant future. We would not expend the funds to develop it if we didn't intend to install it.

Second, as you have seen, the Vernon facility has lost money during the recent past and has limited financial resources. Since the development and conversion to electrowinning is expected to exceed \$8,000,000 and the material handling improvements program expected to exceed \$5,000,000, these cannot be accomplished concurrently. Neither program is expected to result in any significant improvement in productivity -- they are entirely for the benefit of the environment. As such, their burden must be carefully spread to ensure the financial viability of the facility. GNB is leading the industry in these developments, but can only sustain so much burden at a time.

Finally, implementation of the material handling program is likely to shift emission control burdens to other systems at the facility. Just how this affects GNB's air permits or just how long it will take to secure any necessary modifications to those permits is entirely unknown. This will all have to be negotiated before the system can be implemented.

For all these reasons we cannot possibly predict when the material handling system changes will actually occur. We can, however, assure you that if the system is shown to be commercially practical it is our present intention to install it at Vernon as soon as available resources permit.

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

Page 3

Dennis A. Ragen, Esq.

February 3, 1993

2. Has GNB discussed this proposal with AQMD

Response: As you mentioned to me during our phone conversation this morning, GNB engineers and AQMD representatives are apparently discussing what the likely effects of such changes will be and whether GNB's present control systems are capable of handling them. Since you or DTSC have apparently discussed this with AQMD, you may know more than I do on the subject, but it is my understanding that AQMD is interested in the project and presently evaluating its likely affect on the emissions they regulate.

In conclusion, GNB does have "firm, realistic" plans to install this material handling system if it proves practical. We just cannot give you a schedule now because of the uncertainties noted above.

Since further delay in the resolution of this enforcement action will seriously threaten the electrowinning project and since that project is by far the most promising area of development for environmental improvement, I urge you in the strongest possible terms to be reasonable in your expectations on the material handling system. We must settle this case now or risk losing the co-funding needed to develop electrowinning.

As further incentive for your prompt resolution of these issues, GNB is willing to increase its penalty offer from \$100,000 to \$150,000, spread over a three-year period as follows:

\$50,000 payable 30 days after entry of the settlement agreement.

\$50,000 payable January 1, 1994.

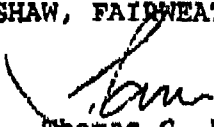
\$50,000 payable January 1, 1995.

This is a significant financial sacrifice for this marginal but important facility. It is meant to dramatize the urgency we feel in the need to resolve this matter. I look forward to your prompt response.

Very truly yours,

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

By


Thomas G. Dent

TGD:js (13300)

ANDREWS & KURTH

L.L.P.

ATTORNEYS

1701 PENNSYLVANIA AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20006

OTHER OFFICES:
HOUSTON
DALLAS
LOS ANGELES
NEW YORK

TELEPHONE: (202) 662-2700
TELECOM: (202) 662-2739
TELEX: 78-1800

February 2, 1993

Via Telecopy

Dennis A. Ragen, Esquire
Deputy Attorney General
California Department of Justice
110 West A Street, Suite 700
P.O. Box 85266
San Diego, CA 92186-5266

Re: K W Plastics and Wiley Sanders Truck Lines

Dear Mr. Ragen:

As you know, we tentatively scheduled a meeting, either on February 18 or 19, to discuss the Department's proposal dated November 16, 1992.

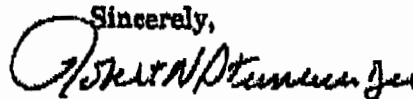
In order to finalize travel plans, I need to know if the meeting is going to occur, the date of the meeting, and the location for the meeting.

Furthermore, I need to receive the correspondence, inspection reports, and test data referenced in my letter dated December 7, 1992. I need to receive this information several days before our meeting.

Please contact me as soon as possible so that I can schedule the trip, secure tickets, and make arrangements with my clients.

Thank you for your attention to this matter.

Sincerely,



Robert N. Steinwurtzel

RNS/rah

GNB Incorporated

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101



November 3, 1988

California Department of Health Services
Southern California Section
Toxic Substances Control Division
107 S. Broadway, Room 7128
Los Angeles, CA 90012

Attention: Mr. John Hinton

Dear Mr. Hinton:

Enclosed are two (2) copies of GNB's Part B application. Enclosure A is in the front section.

Sincerely,

Kenneth G. Clark

Kenneth G. Clark
Tech. & Envir. Manager

KGC:mlf

Enc.

cc: U.S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105
Attn: T-2-2
(W) Enclosure A

INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: GNB Incorporated, Los Angeles Smelter
 EPA I. D. NUMBER: CAD097854541
 LOCATION City Vernon
 State California

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A OR B APPLICATION

	<u>Yes</u>	<u>No</u>
• Landfill	<u>X</u>	<u>—</u>
• Surface Impoundment	<u>—</u>	<u>X</u>
• Land Farm	<u>—</u>	<u>X</u>
• Incinerator	<u>—</u>	<u>X</u>
• Storage Tank (Above Ground)	<u>X</u>	<u>—</u>
• Storage Tank (Underground)	<u>—</u>	<u>X</u>
• Container Storage Area	<u>X</u>	<u>—</u>
• Injection Wells	<u>—</u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u>—</u>
• Transfer Stations	<u>—</u>	<u>X</u>
• Waste Recycling Operations	<u>X</u>	<u>—</u>
• Other Waste Handling Areas Not Covered Above	<u>X</u>	<u>—</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous waste or hazardous constituents under RCRA. Also, include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

See attachment

NOTE: Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A or B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information:

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

See attachment

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

See attachment

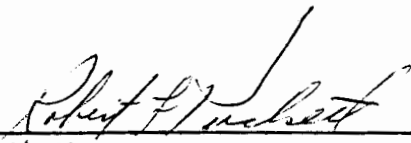
5. Describe the approximate dates and locations of product spills and releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents.

See attachment

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer, of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Signature

Robert L. Puckett, Director Western Region
Name and Title (Typed)

ENCLOSURE A

INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

GNB Incorporated - Los Angeles Smelter
CAD09785451

2.0 DESCRIPTIONS OF SWMU'S AND INVOLVED WASTES

2.1 Landfill

Description: Earthen Disposal Pit

Location: Southwest section of west yard (see attached site plan)

Size or Extent: Longtime employees have estimated that this pit was approximately 50 feet in diameter and 20 feet deep.

Involved Wastes: Blast furnace slag from secondary lead smelting and dross from aluminum and zinc operations.

Potential RCRA Waste Classifications: Possible EP Toxicity for lead and other metals. (D008, D004, D006, or D007).

Quantity or Volume of Waste Treated or Disposed: This pit was filled to capacity with the above wastes. Detailed estimates of quantities are impossible due to a lack of records.

Duration of Activity: Smelting operations began on the site of this facility in 1922. It is not known when use of this pit began. Use of the pit as a disposal site was discontinued in 1973 when the pit became full.

2.2 Storage Tank (Above Ground)

Description: Acid Collection and Neutralization Tank.

Location: Northwest corner of old Morris B. Kirk battery separation building. This area is located just west of the cooling tower. (See attached site plan)

Size or Extent: Capacity of 5000 gallons.

Involved Wastes: Sulfuric acid from spent lead-acid storage batteries.

Potential RCRA Waste Classifications:

Characteristic of corrosivity (D002)
Possible EP-Toxicity for lead and other metals
(D002, D004, D006, or D007).

Quantity or Volume of Waste Treated or Disposed:
Impossible to determine

Duration of Activity: Smelting operations began on the site of this facility in 1922. It is not known when this tank was constructed. Use of the tank was discontinued when it was removed in 1955.

2.3 Container Storage Area

Description: Battery Storage Area

Location: Open areas of the west yard (see attached site plan).

Size and Extent: As much as an acre of the west yard may have been involved, though details are not readily available.

Involved Wastes: Spent lead-acid storage batteries contain sulfuric acid and lead along with small amounts of other metals.

Potential RCRA Waste Classifications:

Characteristic of corrosivity (D002)
Possible EP-toxicity for lead and other metals
(D008, D004, D006, or D007).

Quantity or Volume of Waste Treated or Disposed: None. This area was used for storage only. Batteries were stored on pallets in this area. It is common to stack batteries as much as five feet high for such storage. The maximum capacity of the area would therefore be approximately 7500 cubic yards though it is extremely unlikely that this full capacity was ever utilized at any one time. Total volume handled over the years in this area is impossible to determine.

Duration of Activity: Smelting operations on the site of this facility began in 1922. It is likely that batteries were stored in this area from the beginning of operations. Use of this area was phased out following the construction of the new plant by Gould, Inc. in 1982. This area has been occasionally used to temporarily store batteries on pallets on those occasions when the battery receiving buildings became full over the past several years.

2.4 Wastewater Treatment Units

Description: Effluent Treatment Area

Location: North of the main battery receiving building (see attached site plan).

Size and Extent: The effluent treatment area contains a 5800 gallon iron solution tank, a 60,900 gallon surge tank, a 14,100 gallon reaction tank, a 1480 gallon flocculation tank, a 7800 gallon clarifying tank, a 3000 gallon sand filter feed tank and a 5430 gallon sludge tank.

Involved Wastes: Process wastewater from the neutralization of spent battery acid and collected stormwater.

Potential RCRA Waste Classifications:

The process wastewater contains lead and other metals at concentrations requiring further treatment before discharge to the POTW. This treatment is carried out in these units which are exempt from regulation under RCRA.

Quantity or Volume of Waste Treated or Disposed:

76,803,027 gallons of treated effluent were discharged from the facility in 1987.

Duration of Activity: These water treatment systems were installed in 1987. Prior to that time, water treatment was carried out in the acid tank described in Section 2.2 and in other units located at the present site following the removal of the acid tank.

2.5 Waste Recycling Operations

Description: Wastewater Treatment Sludge Collection.

Location: Wastewater treatment sludge collection occurs in the filter press located in the effluent treatment area (see attached site plan).

Involved Wastes: Filtercake from wastewater treatment processes.

Potential RCRA Waste Classification:

These wastes contain lead in concentrations high enough to warrant their being recycled to the furnaces for lead recovery. Other metals may be present in much lesser amounts.

Quantity or Volume of Waste Treated or Disposed:
Approximately one cubic yard per day of the sludge is recycled to the furnace operation.

Duration of Activity: This unit was installed with the construction of the new wastewater treatment system in 1987.

2.6a Other Waste Handling Areas

Description: Earthen acid dump pit

Location: Near the middle of the property at the western fence line (see attached site plan)

Size or Extent: Unknown

Involved Wastes: Spent battery acid and other unidentified wastes.

Potential RCRA Waste Classifications:

Characteristic of corrosivity (D002)

Possible EP-toxicity for lead and other metals
(D008, D004, D006, or D007)

Quantity or Volume of Waste Treated or Disposed: Excess acid that could not be processed in the acid tank described in Section 2.2 was dumped into this pit for an unknown of years. Actual quantities of this and other wastes disposed of in this manner are impossible to determine.

Duration of Activity: Unknown. No longer utilized.

2.6b Other Waste Handling Areas

Description: Slag Storage Pile

Location: Just south of the west yard warehouse (see attached site plan)

Size or Extent: Unknown

Involved Wastes: Blast furnace slag

Potential RCRA Waste Classification:

Possible EP-Toxicity for lead and other metals
(D008, D004, D006, or D007).

Quantity or Volume of Waste Treated or Disposed: None. Slag was only temporarily stored in this location prior to shipment.

Duration of Activity: Use of this area began in 1973 when the landfill of Section 2.1 became filled. On-site slag storage ended with the completion of the new smelter in 1982.

2.6c Other Waste Handling Areas

Description: Crushed Battery Storage Area

Location: Just north of the current water softening building (see attached site plan)

Site or Extent: Unknown

Involved Wastes: It is not known to what extent the battery casings were washed before crushing. Cases without sufficient washing could still contain acid and metals to a degree that might exhibit hazardous characteristics.

Potential RCRA Waste Classifications:

As mentioned above, there is the possibility that these casings would exhibit the characteristic of corrosivity (D002) and EP-Toxicity for lead and other metals (D008, D004, D006, or D007).

Quantity or Volume of Waste Treated or Disposed: unknown

Duration of Activity: Smelting operations began on the site of this facility in 1922. It is not known at what time this practice began, nor when it ended. It is known that this practice did not continue beyond the construction of the new plant in 1982.

2.6d Other Waste Handling Areas

Description: Rubber Chip Storage Area

Location: East end of the main battery receiving building (See attached site plan)

Size or Extent: Approximately 2000 square feet.

Involved Wastes: Crushed rubber chips from the RMPS

Potential RCRA Waste Classifications:

Possible EP-Toxicity for lead and other metals (D008, D004, D006, or D007)

Quantity or Volume of Waste Treated or Disposed: None. This area is for the short term (less than 90 days) storage of these chips prior to their off-site shipment.

Duration of Activity: This area has been in use since the construction of the new plant in 1982.

2.6e Other Waste Handling Areas

Description: Old Battery Separation Building

Location: At the location of the current plant's cooling tower (see attached site plan).

Site of Extent: Approximately 2000-2500 square feet

Involved Wastes: Spent acid from lead-acid storage batteries.

Potential RCRA Waste Classifications:

Characteristic of corrosivity (D002)
Possible EP-Toxicity for lead and other metals
(D008, D004, D006, or D007)

Quantity or Volume of Waste Treated or Disposed: unknown

Duration of Activity: Smelting operations began on the site of this facility in 1922. It is not known when this particular unit was constructed. Its use was discontinued with the completion of the new plant in 1982.

2.6f Other Waste Handling Areas

Description: Old Mixed Metals Extrusion Building

Location: Just west of the current engineering building (see attached site plan)

Size and Extent: Approximately 10,000 square feet

Involved Wastes: Spent trichloroethene (TCE) used as a cooling medium in the extrusion process.

Potential RCRA Waste Classification:

TCE is one of the spent halogenated solvents listed under hazardous waste number F001 in 40 CFR 261.31. TCE is also a hazardous constituent listed in Appendix VIII.

Quantity or Volume of Waste Treated or Disposed: Unknown

Duration of Activity: Mixed metal operations were terminated in 1977 or 1978. It is not known exactly when these operations were begun.

2.6g Other Waste Handling Areas

Description: Zinc Alloy Operations Area

Location: In the area currently occupied by the rainwater retention pond (see attached site plan)

Size or Extent: Approximately 10,000 square feet.

Involved Wastes: Unknown zinc compounds and alloys which may include zinc chloride

Potential RCRA Waste Classification: none

Quantity of Volume of Waste Treated or Disposed: None. Zinc compounds were stored and processed in this area only.

Duration of Activity: Smelting operations began on this site in 1922. The beginning of zinc operations is not known. Zinc alloy operations ended sometime in 1974.

3.0 Prior Releases of Hazardous Wastes or Constituents

3.1 Earthen Disposal Pit

No known releases

3.2 Acid Collection and Neutralization Tank

No known releases

3.3 Battery Storage Area

- a. Dates of releases: Common and frequent small spills from leaking spent lead-acid storage batteries occurred throughout the life of the unit. One distinct spill during the 1960's stood out in the recollections of long-time employees.
- b. Type of waste released: Sulfuric acid from spent lead-acid storage batteries.
- c. Quantity of waste released: unknown
- d. Nature of releases: primarily small spills from leaking lead-acid storage batteries with damaged cases.

3.4 Wastewater Treatment Units

No known releases

3.5 Wastewater Treatment Sludge Collection

No known releases

3.6a Earthen Acid Dump Pit

- a. Dates of releases: Ongoing releases throughout the life of the unit.
- b. Type of waste released: Sulfuric acid from spent lead-acid batteries.
- c. Quantity of waste released: unknown
- d. Nature of releases: Due to the ability of the pit to continually "absorb" the acid disposed of in it, it must be assumed that all of the disposed acid was "released" to the soil.

3.6b Slag Storage Area

No known releases

3.6c Crushed Battery Storage Area

No known releases

3.6d Rubber Chip Storage Area

No known releases

3.6e Old Battery Separation Building

- a. Dates of releases: Ongoing releases throughout the life of the unit may have occurred.
- b. Type of waste released: sulfuric acid from spent lead-acid storage batteries.
- c. Quantity of waste released: unknown
- d. Nature of releases: Relatively frequent small spills of acid were washed down with water and allowed to collect in low spots of the concrete floor. No attempt was made to recover this water which either evaporated or soaked into the concrete.

3.6f Old Mixed Metals Extrusion Building

- a. Date of releases: Ongoing releases throughout the life of the unit.
- b. Type of waste released: Trichloroethene (TCE)
- c. Quantity of waste released: unknown
- d. Nature of releases: TCE was applied as a cooling medium to continuous metal bars upon their exit from the extrusion press. It is unknown whether most of the TCE evaporated or dripped onto the building floor.

3.6g Zinc Alloy Operations Area

- a. Dates of releases: unknown
- b. Type of wastes released: Unknown alloys of zinc and other metals.
- c. Quantity of waste released: unknown
- d. Nature of Releases: Unknown. Pure zinc ingots were stored on-site on concrete aprons and zinc chloride was stored in an above ground tank in this area. The exact source of any releases from the area cannot be determined from the available employee interviews.

4.0 Analytical Data Defining Nature of Contamination

Extensive sampling of soils and groundwater at the GNB facility has been performed over the past three years. Detailed results of these analyses along with methodology discussions and a more extensive site history may be found in the reports "Phase I Site Assessment Review of Existing Data GNB Vernon Plant", the subsequent "Phase III Soil and Groundwater Investigation GNB Incorporated in Vernon, CA" and the "Report on Groundwater Sampling at GNB Incorporated Vernon Facility" submitted to the California Regional Water Quality Control Board - Los Angeles Region (RWQCB). The Department is referred to these documents for a complete discussion of the available analytical data defining the nature and extent of contamination at the Vernon facility.

The following brief summary of the results of these studies is presented to aid the Department in its evaluation of the above described SWMU's. The attached monitoring well location map also includes approximate groundwater gradient contours.

4.3 and 4.6a Battery Storage Area and Earthen Acid Dump Pit

The pH of groundwater samples taken from MW-8 in 1987 and 1988 averaged 3.27. The pH of samples from MW-13 averaged 3.65. These results support the conclusion that much of the acid dumped in the dump pit was "released" to the subsurface environment. The pH found at MW-7 was approximately neutral which would suggest that the battery storage area contributed very little to the acidic conditions at MW-8 and that the acid dump pit was the primary contaminant source. Near neutral conditions at MW-9 (upgradient) support the conclusion that a localized source of acidity has resulted from the past practice of acid dumping in the earthen pit at the west fence line.

Elevated levels of lead and other metals have been detected in wells MW-7, 8, 13 and PW-1 in the vicinity of these units. The lower lead levels at MW-9 again support the conclusion that the acid dump pit may have contributed to groundwater contamination.

4.6e Old Battery Separation Building

The pH of the most recent groundwater samples at MW-14 (February 1988) was 4.4. The pH at this well in July of 1987, however, was 6.8. The acidity of the 1988 sample suggests that releases of acid from the old battery separation building may have contributed to groundwater contamination.

Lead has been detected at levels exceeding the drinking water standard of 0.05 mg/l at least once at every facility well with the exception of MW-15. Lead concentrations appear to be widely fluctuating and seasonally dependent. This indicates that the upper level aquiclude beneath the facility may be diluting the metals during the winter and spring months when precipitation is highest.

Concentrations of other metals in the groundwater follow similar patterns and support the above conclusions.

4.6f Old Mixed Metals Extrusion Building

Concentrations of Trichloroethene (TCE) have averaged 2300 ug/l at MW-11. The relevant drinking water standard for this constituent is 5 ug/l. Wells MW-14 and PW-2, also downgradient of the Old Mixed Metals Extrusion Building, have TCE concentrations in the 200-300 ug/l range. These results support the conclusion that the use of the TCE in the extrusion process may have led to the contamination of groundwater in the area.

4.6g Zinc Alloy Operations Area

Zinc concentrations averaging 150 mg/l have been found in groundwater from MW-5. The Relevant Drinking Water Standard for zinc is 5 mg/l. While zinc has been detected at several other wells in excess of the standard, MW-5 has by far the highest concentrations. These data support the conclusion that Zinc Alloy Operations in the vicinity of MW-5 may have led to groundwater contamination.

5.0 Product Spills and Releases

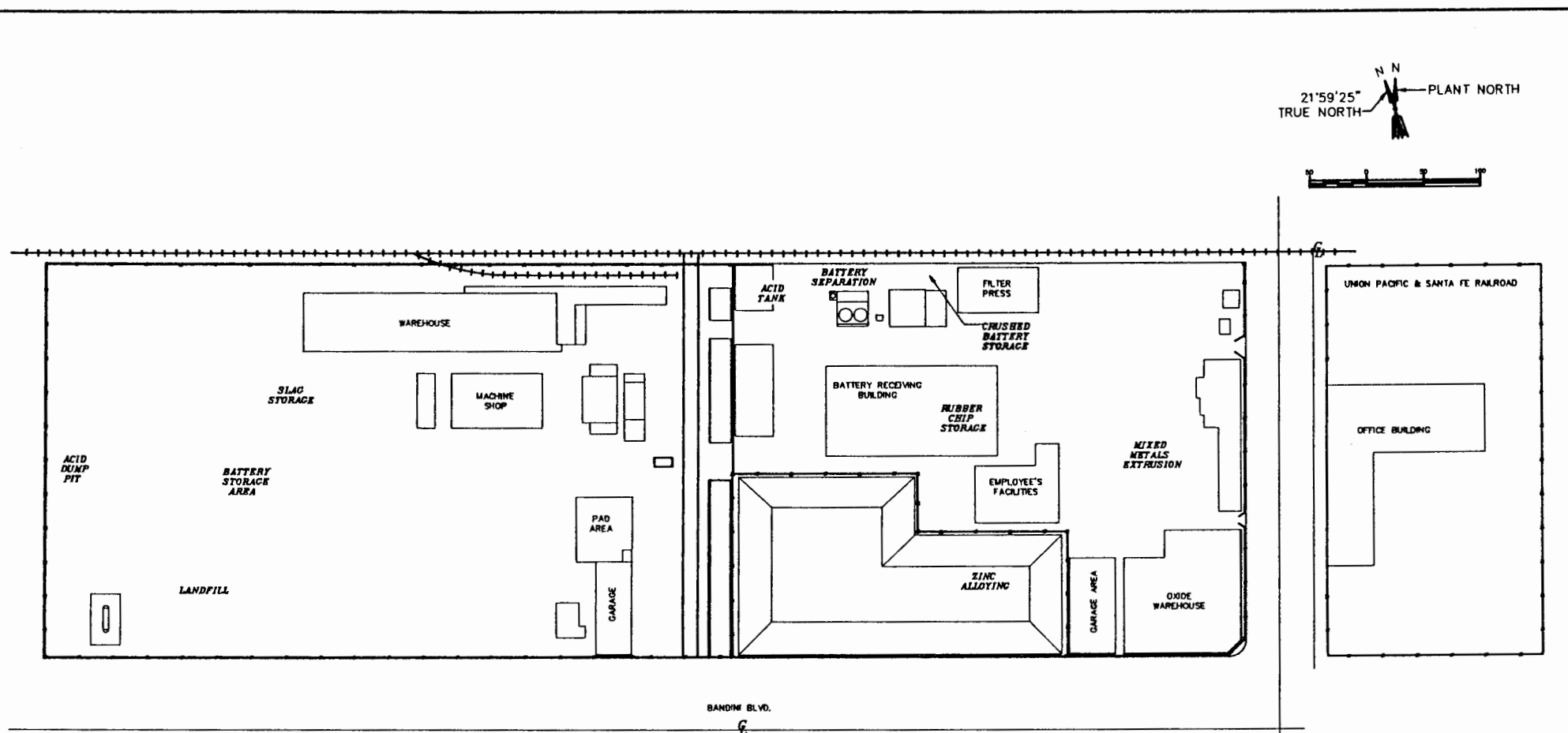
5.1 Molten Lead Leak

Description: A molten lead leak from a refining pot resting on bare soil.

Location: In the old plant refinery, location unknown

Date: Early 1950's

Clean-up Activity: Workers dug to a depth of approximately 35 feet to reclaim lead in the soil. Digging and removal of soil continued until no lead was visible in the soil.



490-029

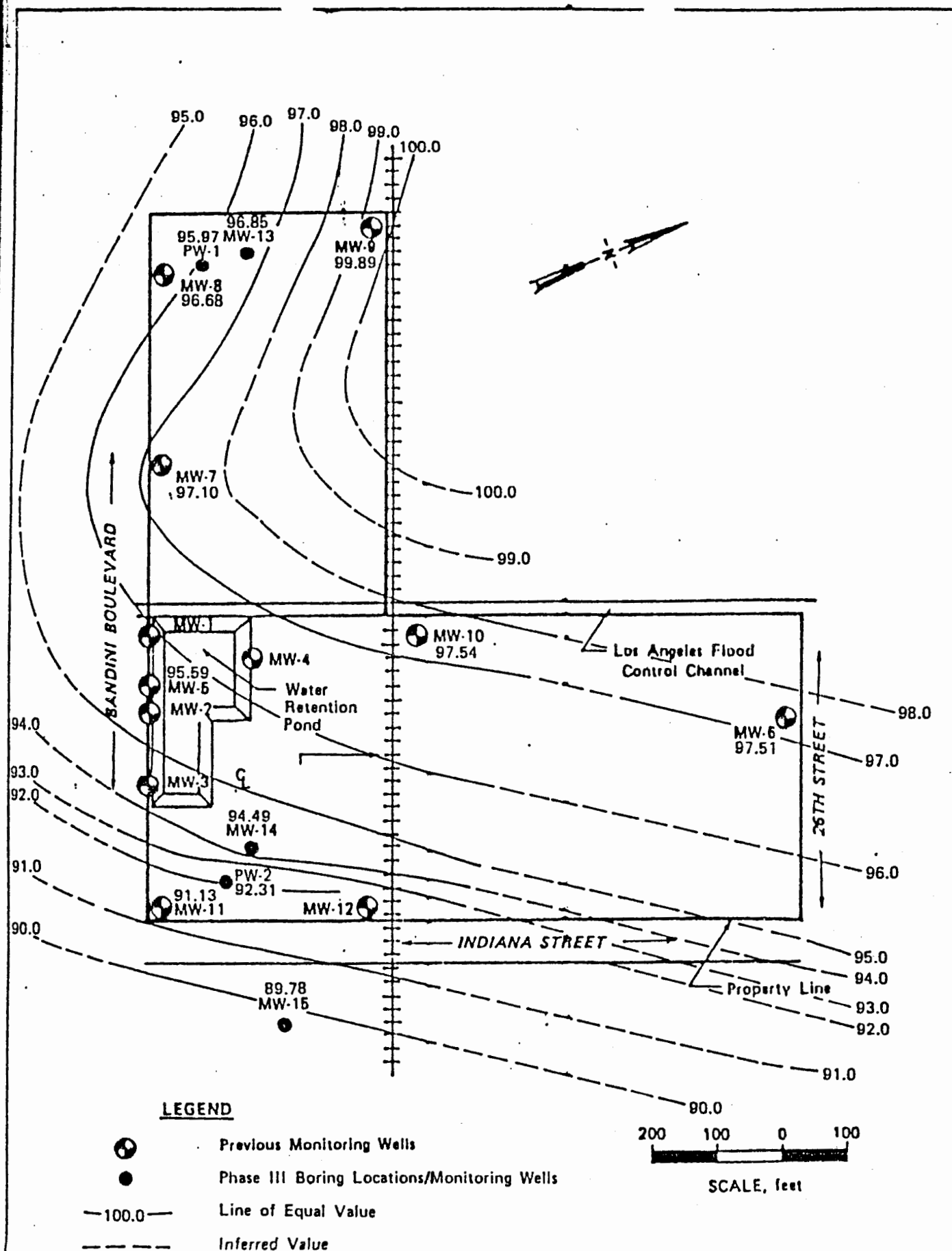


LAKE ENGINEERING, INCORPORATED
8000 LAKE FORREST DR. SUITE 350
ATLANTA, GEORGIA 30328

GNB, INCORPORATED
VERNON, CALIFORNIA

LOCATIONS OF SOLID WASTE
MANAGEMENT ACTIVITIES

FIGURE



Project: GNB-VERNON
Project No. 8141996D

LOCATIONS OF MONITORING WELLS AND
ESTIMATED GROUND WATER GRADIENT

Fig.
2-2

ated

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101
CAD097854541



May 16, 1988

Jim
US EPA
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Sir:

Please be informed that it is the intention of GNB Incorporated to continue hazardous waste management activities at the facility address shown above, and to file a Part B application by November 8, 1988.

Sincerely,

Kenneth G. Clark

Kenneth G. Clark
Tech. & Envir. Mgr.

KGC:mlf

GNB Incorporated

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101

file (N)



March 13, 1987

Policy & Programs Management Section (T-2-1)
EPA Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Sirs:

GNB Incorporated, at its plant shown on the letterhead address, has been a generator of hazardous waste for several years, and now wishes to begin transporting hazardous waste. We currently have permits from the State of California to haul hazardous material and hazardous waste, and the vehicles have passed inspection by the California Highway Patrol.

It is my understanding that, subject to your approval, we may use our EPA Generator's I.D. number as a Transporter's number. If this is the case, please acknowledge on the enclosed copy of this letter. If not, please advise me of the proper procedure to follow.

EPA Generator's I.D. No. CAD097854541
California Hazardous Materials License No. 36409
California Hazardous Waste Hauler's Permit No. 2157

Sincerely,

Kenneth G. Clark
Kenneth G. Clark
Tech. & Envir. Manager

KGC:mlf

Enc. 1

GNB Incorporated

2700 South Indiana Street
P.O. Box 23957
Los Angeles, CA 90023-0957
Telephone (213) 262-1101



March 13, 1987

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EPA Generator's I.D. No. CAD097854541
California Hazardous Materials License No. 36409
California Hazardous Waste Hauler's Permit No. 2157

Sincerely,

Kenneth G. Clark
Tech. & Envir. Manager

KGC:mlf

Enc. 1

"Received and acknowledged _____"

Date _____

GNB Incorporated

Corporate Headquarters

Mailing Address:
P.O. Box 64100
St. Paul, MN 55164-0100 U.S.A.

1110 Highway 110
Mendota Heights, MN 55118
Telephone (612)681-5000



March 31, 1986

California Department of Health Services
Toxic Substances Control Division
Hazardous Waste Management Section
P.O. Box 3000
Sacramento, CA 95812

RE: CAD097854541 - Faculty-Biennial Hazardous Waste Report
for 1985 - Addendum

Enclosed is an addendum to our Facility Biennial Hazardous Waste report for the calendar year 1985. This addendum supplements the information provided to you by Mr. Kenneth G. Clark in his submittal of February 27, 1986, and contains quantities of material that we received for recycling. This material was recycled by lead smelting and was not regulated as a hazardous waste. This addendum report is provided for informational purpose only.

Sincerely,

A handwritten signature in dark ink, appearing to read 'A. H. Larson', written over a horizontal line.

A. H. Larson, Director
Engineering & Environmental Assurance
Metals Operations

cc: California Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7011
Los Angeles, CA 90012

Regional Water Quality Control Board
107 South Broadway, Room 4027
Los Angeles, CA 90012

U.S. EPA
Region 9, T-2-2
215 Freemont Street
San Francisco, CA 94105

AHL/dbc

GNB Incorporated

Automotive Battery Division

Mailing Address:
P.O. Box 64100
St. Paul, MN 55164-0100 U.S.A.

1110 Highway 110
Mendota Heights, MN 55118
Telephone (612)681-5000



October 7, 1985

Mr. Micheal T. Feeley
Chief RCRA State Program Sect.
US EPA Region 9
215 Fremont St.
San Francisco, CA 94105

RE: CAD 097854541 GNB, Incorporated
Metals Division, Los Angeles, CA.
Lead Reclamation Facility

Dear Mr. Feeley:

Enclosed is a summary of processing of scrap lead-acid batteries at the referenced facility for your review prior to our meeting at your office on Thursday, October 10th at 1:00 p.m.

We appreciate your agreement to have this meeting. There are a number of issues regarding our plant processing as they relate to the recently amended hazardous waste regulations. We are uncertain as to our status at this point in time.

If you have any questions prior to the meeting, please call Mr. Tom Dent at (312) 346-8000.

Sincerely,

A handwritten signature in cursive script, appearing to read 'A. H. Larson'.

A. H. Larson, Director
Process Engineering

Enclosure

cc: T. Dent
T. Hatterschide
K. Clark

fc7L02

pmh

Pat - file

05/28/94

15:41

202 260 415

8202

4100

EPA/OWPE/RED

001/005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF WASTE PROGRAMS ENFORCEMENT
RCRA ENFORCEMENT DIVISION
WASHINGTON, D.C. - 202-260-8630 - FAX NUMBER

TO: Tim Sullivan

FAX
NUMBER: 911/415/744-1044

OFFICE: Region 9

FROM: Carolyn Carr - EPA HQ

DATE: 5/26/94 NUMBER OF PAGES: 5

COMMENTS:

Please see amended Notifia
for EC-93-695. If you see
a problem with this let me
know; another Tree Island
notification.



05/26/94 15:41 202 000 4100
05/26/94 11:49 81. 33 0508

EPA/OWPE/RED
Hazardous Waste - J.S.E.P.A.

002/005
002



Environment
Canada

Environnement
Canada



Ottawa (Ontario)
K1A 0H3

26-MAY-1994

Ms. Carolyn Carr
Policy and Regional Operations Branch
RCRA Enforcement Division (OS-520)
U.S.E.P.A.
401 M Street S.W.
Washington, DC 20460

Dear Ms. Carolyn Carr,

In accordance with Article 3 (a & b) of the Canada/United States Agreement Concerning the Transboundary Movement of Hazardous Waste, enclosed please attached the following amendment;

Tree Island Industries Ltd. has informed this office that they have erroneously requested the quantity of one shipment as opposed to the total quantity for the year (12 shipments). I have informed them that this will require a re-review of their original request for notification # 32901 (93-0675-EXP). Your original date of consent for this file is February 13, 1994.

Should you require any additional information on this subject, or should there be any problems with this request, do not hesitate to call me at (819) 953-1142. If you could please inform me when this has completed and thank you for all of your assistance with this matter.

Yours sincerely;

Allen Adair
Notification Officer
Office of Waste Management

- 1 -

Canada

Printed on recycled paper
Imprimé sur du papier recyclé



05/26/94 15:41 202 290 4100
03/26/94 11:50 81 53 0508
05/24/94 10:46 604 524 2362

EPA/OWPE/RED

003/005

Hazardous Waste U.S.E.P.A.

003

TREE ISL. ADMIN.

001



TREE ISLAND INDUSTRIES LTD.

Richmond, B.C. (Canada)

P.O. Box 50

New Westminster, B.C.

V3L 4Y1

TEL: (604)524-3744 FAX: (604)524-2362

TO: ENVIRONMENT CANADA
Mr. Allen Adams

FAX NO.: 1-819-953-0508

DATE:

FROM: M. GUENTHER

NO. PAGES

RE: Notice 32901

Please find attached an amended notice for export of lead
~~modules~~ to the USA. In the process of retyping from the
older style form, which we had originally filled in,
the total quantity was lost and the quantity per
shipment became the total quantity.

Please process as soon as possible at your earliest
convenience.

Thank you for your cooperation

Regards

Fax sent by:

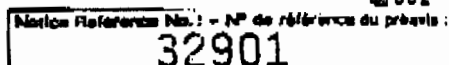
TREE ISLAND INDUSTRIES LTD.

Mat Guenther, DPL, INC.
ENVIRONMENT MANAGER

Mailing P.O. Box 50, New Westminster, B.C. Canada V3L 4Y1
Phone: (604) 524-3744 Fax: (604) 524-2362
Canada Toll Free 1-800-663-0855

004

002



NUMBER OF EXPORTS OR IMPORTS: NOMBRE D'EXPORTATIONS OU D'IMPORTATIONS :		12		7 CUSTOMS OFFICES: BUREAUX DE DOUANE		Huntington		Attached ci-jointe		<input type="checkbox"/>					
FIRST EXPORT OR IMPORT PREMIERE EXPORTATION OU IMPORTATION		Departure: Départ :		Y - A 9 1 4		M 0 1 2		D - J 0 1 1		Arrival: Arrivée :					
TRANSIT COUNTRY(IES) PAYS DE TRANSIT		Country: Pays :		Length of Stay: Durée du transit :				Attached ci-jointe		<input type="checkbox"/>					
HAZARDOUS WASTE INFORMATION RENSEIGNEMENTS SUR LES DECHETS DANGEREUX				(b) ID No. set out in Schedule III: N° d'identification donné à l'annexe III :		(c) TDQR PIN: NIP du RTMD :		(d) Net Weight Poids net Net Weight Poids net		(e) Quantity of Each Waste: Quantité par déchet :		(f) Packing Group: Groupe d'emballage :		(g) Packaging Type: Type d'emballage :	
(a) International Waste Identification Code: Code International d'Identification des déchets :															
1) Leachable toxic waste (L17) (Scrap lead residues in the form of ashes, sludge and dross)						NA9500		9.3		900,000 <input checked="" type="checkbox"/> kg <input type="checkbox"/> L		111		05	
2)										<input type="checkbox"/> kg <input type="checkbox"/> L <input type="checkbox"/> kg					

COMMUNITY UPDATE

The mission of DTSC is to protect California's people and the environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation and pollution prevention.

Draft Cleanup Work Plan for Public Review and Comments – Exide Technologies

The Department of Toxic Substances Control (DTSC), the state agency responsible for the cleanup of hazardous waste and contaminated sites, is overseeing a soil investigation, removal and cleanup of lead contaminated soil in residential yards near the Exide Technologies plant located in Vernon, California. DTSC invites your comments on the draft Interim Measures Work Plan (IMWP) for the removal of lead contaminated soils in residential yards located in portions of Boyle Heights, East Los Angeles and Maywood.

Site Location and Background of Soil Testing and Removal

Exide recycles lead from used batteries. Exide's Vernon plant has been operating as a metal recycling facility for more than 90 years. In 2013, DTSC ordered Exide to test soil for lead in portions of Boyle Heights and East Los Angeles (Northern Assessment Area), and Maywood (Southern Assessment Area), the two areas identified most likely to be affected by Exide's air emissions (See Attached Maps). In fall 2013, thirty nine (39) homeowners allowed soil testing at their yards within these two assessment areas. Some soil samples taken in these neighborhoods showed high levels of lead. As a result, DTSC ordered Exide to collect additional soil samples from within the two assessment areas. In August 2014, as retesting was being conducted, soil with high levels of lead was successfully removed from two residential yards in the Northern Assessment Area.

Draft Interim Measures Work Plan

The draft IMWP has been prepared in accordance with DTSC's directive to Exide and the February 2002 Corrective Action Consent Order. The draft IMWP describes the action that will be taken to cleanup lead contaminated soils at residential properties where high lead levels are found. These actions will include soil removal, dust control and air monitoring, yard restoration work, and interior home cleaning. DTSC is committed to the cleanup of lead contaminated soils in the residential yards and any additional soil sampling requested by homeowners within the assessment areas. Soil sampling and cleanup will be conducted at no cost to the property owners. Properties will be restored to their original condition following the soil removal activities. The draft IMWP is available for public review and comment.



Public Comment Period

September 16 - October 20, 2014

DTSC encourages your participation. All comments concerning the draft IMWP, draft Negative Declaration, and Initial Study can be submitted in writing to:

Peter Ruttan
DTSC Project Manager
8800 Cal Center Drive
Sacramento, CA 95826

Email: peter.ruttan@dtsc.ca.gov

Fax: (916) 255-3734

Emailed, faxed or written comments must be received or post marked by **Monday, October 20, 2014.**

Comments will be considered before a final decision on the IMWP and the Negative Declaration are made. Notification of the final decision and a copy of a response to comments will be provided to those who submit comments and/or by request. The draft IMWP and the draft Negative Declaration are available for review at:

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80001733

Robert L. Stevenson Public Library,
803 Spence Street
Los Angeles, CA 90023

Cesar Chávez Public Library
4323 Slauson Avenue
Maywood, CA 90270

DTSC Regional Records Office,
5796 Corporate Avenue
Cypress, CA 90636

NOTICE TO HEARING IMPAIRED: TTY users may use the California Relay Service @ 711 or 1-800-855-7100.
You may also contact the Public Participation Specialist listed at the end of this update.

Cal/EPA



DTSC



State of California



California Environmental Quality Act - Notice of Availability

An Initial Study and draft Negative Declaration have been prepared in accordance with the California Environmental Quality Act (CEQA). DTSC has determined that the proposed remedial activities will have a less than significant effect on the environment. The Initial Study and draft Negative Declaration are available for public review and public comment.

How to Participate

DTSC encourages your participation. Comments concerning the draft IMWP and the associated CEQA documents may be submitted in writing to Peter Ruttan, DTSC Project Manager, 8800 Cal Center Drive, Sacramento, CA, 95826, or faxed to (916) 255-3734 or email: Peter.Ruttan@dtsc.ca.gov. All emailed, faxed or written comments must be received or postmarked no later than **Monday, October 20, 2014**. All comments will be carefully considered before making a final decision on the IMWP and Negative Declaration. Notification of the final decision and a copy of DTSC's response to comments will be provided to those who submit comments along with their contact information and/or by request.

How to Get Your Property Sampled

To schedule soil sampling in your yard, property owners within the assessment areas can contact DTSC at 1-844-225-3887.

WHERE DO I GET MORE INFORMATION?

A copy of the Draft IMWP, Initial Study, Draft Negative Declaration, and this Community Update are available for review at the following repositories:

Maywood Cesar Chavez Public Library
4323 Slauson Avenue
Maywood, CA 90270
(323) 771-8600

Robert L. Stevenson Branch Library
803 Spence Street
Los Angeles, CA 90023
(323) 268-4710

DTSC Regional Records Office
5796 Corporate Avenue
Cypress, CA 90630
(714) 484-5337

Information about the Site can be found online at the DTSC EnviroStor website:

http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80001733



NORTHERN ASSESSMENT AREA



0 145 290 580 Feet

Map created March 17, 2014

Southern Neighborhood



0 162.5 325 650
Feet

Map created March 17, 2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 4, 1994

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Notification of Intent to Import Hazardous Waste from
Canada into Region 9

FROM: *fr* Mark Pollins, Acting Chief *Mark Pollins*
Policy and Regional Operations Branch
RCRA Enforcement Division

TO: Karen Schwinn, Chief
Waste Compliance Branch (T-2-B)
Region 9

Attached, for your designated import staff's review, are notification(s) for intent to import hazardous waste into your Region from Canada. These notification(s) are in accordance with Article 3 (a) (b) of the United States/Canada Agreement concerning Transboundary Movement of Hazardous Waste. **This agreement requires that the United States respond with consent or objection within 30 days from the receipt date indicated on the notification(s), which is the date that the notification is actually received in the Policy and Regional Operations Branch, Operations Management Section.** If your Region decides to object to this import request, you must notify Carolyn Carr at (202) 260-2810 before the 30-day timeframe expires. If you do not notify us of your objection, per the agreement, consent is automatic. We appreciate your attention to this matter and look forward to a timely response.

Notification for Intent to Import

<u>Exporter Name</u>	<u>Origin</u>	<u>Number</u>	<u>Destination</u>
Tree Island Industries	Richmond, BC	93-0675	Los Angeles, CA
Safety-Kleen Corp.	Nisku, AB	94.0013	Reedhey, CA

Attachment(s)

cc: Region 9 Coordinator



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

For proposed export or import of hazardous wastes, where Canada is not a country of transit,
pursuant to subsection 43(3) of the Canadian Environmental Protection Act
pour l'exportation ou d'importation de déchets dangereux, lorsque le Canada n'est pas un pays de transit,
conformément au paragraphe 43(3) de la Loi canadienne sur la protection de l'environnement

EC-0675 EC-0675.1-.2

1. Option that applies to your export or import.
L'option qui s'applique à l'exportation ou l'importation visée.

☐ Recycling, Part III, Division A
Recyclage, partie III, section A

☒ Recycling, Part III, Division B
Recyclage, partie III, section B

Recycling, Part III, Division B, subsection 16(3) or 17(3).
Pre-approved Facility
Recyclage, partie III, section B, paragraphe 16(3) ou 17(3).
Installation approuvée au préalable

2. EXPORTER OR FOREIGN GENERATOR EXPORTATEUR OU PRODUCTEUR ÉTRANGER		3. FOREIGN RECEIVER OR IMPORTER DESTINATAIRE ÉTRANGER OU IMPORTATEUR	
ID No. from Province or Country: N° d'identification provincial ou national : BCG - 00118		Licence or Permit No.: N° de licence ou de permis : CAD 097854541	
Name: Nom : Island Industries Ltd. Address: Adresse : 3933 Boundary Rd. Shipping Site Address: Adresse du site d'envoi : Richmond, B. C. V6V 1T8		Name: Nom : GNB Incorporated Address: Adresse : 2700 South Indiana St Los Angeles, Ca Receiving Site Address: Adresse du site de réception : 3900 E 26th St Los Angeles Vernon, Ca USA 90023-0957	
Tel. No.: N° de tél. : (604) 524-2362		Tel. No.: N° de tél. : (213) 262-1101 Fax No.: N° de téléc. : (213) 266-1817	
4. CARRIER TRANSPORTEUR		5. FINAL DESTINATION (IF OPERATION D13, D14, R12 OR R13, OR IF THE IMPORTER IS NOT THE RECYCLER OF THE HAZARDOUS WASTE IN CANADA) DESTINATION FINALE (DANS LE CAS DES OPÉRATIONS D13, D14, R12 OU R13 OU DANS LE CAS OÙ L'IMPORTATEUR N'EST PAS LE RECYCLEUR DES DÉCHETS DANGEREUX AU CANADA)	
Licence or Permit No.: N° de licence ou de permis : N/A		Licence or Permit No.: N° de licence ou de permis :	
Name: Nom : Southern Railway of B. C. Ltd. Address: Adresse : 5935 Glover Road Langley B.C. V3A 4B5		Mode of Transport: Mode de transport : <input type="checkbox"/> Road/Route <input checked="" type="checkbox"/> Rail/Rail <input type="checkbox"/> Marine/Mer <input type="checkbox"/> Air/Air If other carriers, attach a list. S'il y a d'autres transporteurs, annexe une liste. <input type="checkbox"/> Attached ci-jointe	
Tel. No.: N° de tél. : (604) 521-1966		Tel. No.: N° de tél. : () Fax No.: N° de téléc. : ()	

SHIPPING DETAILS - DÉTAILS SUR LES ENVOIS

6. NUMBER OF EXPORTS OR IMPORTS: NOMBRE D'EXPORTATIONS OU D'IMPORTATIONS : 12		7. CUSTOMS OFFICES: BUREAUX DE DOUANE : Huntington	
8. FIRST EXPORT OR IMPORT PREMIÈRE EXPORTATION OU IMPORTATION		Departure: Départ : Y - A M D - J 9 14 0 1 2 0 1	
9. TRANSIT COUNTRY(IES) PAYS DE TRANSIT		Length of Stay: Durée du transit :	
10. HAZARDOUS WASTE INFORMATION RENSEIGNEMENTS SUR LES DÉCHETS DANGEREUX		Attached ci-jointe	
International Waste Identification Code: Code international d'identification des déchets :	ID No. set out in Schedule III: N° d'identification donné à l'annexe III :	TDGR PIN: NIP du RTMD :	Quantity of Each Waste: Quantité par déchet :
1) Leachable toxic waste (L17) (Scrap lead residues in the form of ashes, sludge and dross)	NA9500	9.3	75 000 kg 111 05
2) form of ashes, sludge and dross)			
3)			

11. SPECIAL HANDLING INSTRUCTIONS:
 INSTRUCTIONS DE MANUTENTION PARTICULIÈRES
 Emergency response telephone # 604 524-3744

12. UNDERTAKING OF EXPORTER - ENGAGEMENT DE L'EXPORTATEUR
 I undertake, where Canada is not a country of transit, under the circumstances set out in subsection 19(1) of the Export and Import of Hazardous Wastes Regulations, to make other arrangements or return the hazardous waste as provided in section 19 of those Regulations.
 Je m'engage, lorsque le Canada n'est pas un pays de transit, dans les circonstances visées au paragraphe 19(1) du Règlement sur l'exportation et l'importation des déchets dangereux, à prendre d'autres arrangements ou à renvoyer les déchets dangereux conformément à l'article 19 du règlement.

Name of Exporter: Nom de l'exportateur :	Signature :	Date :
Dennis Wiebe	<i>Dennis Wiebe</i>	Nov. 25/93

13. CERTIFICATION AND SIGNATURE: I declare that I have personal knowledge of the information in this notice and that it is correct.
ATTESTATION ET SIGNATURE : Je déclare avoir pris connaissance des renseignements contenus dans le présent préavis et j'atteste qu'ils sont exacts.

Name of Exporter or Importer: Nom de l'exportateur ou de l'importateur :	Signature :	Date :	Tel. No.: N° de tél. :
Dennis Wiebe	<i>Dennis Wiebe</i>	Nov. 25/93	(604) 524-3744

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Pat - file

✓ A. H. Larson
Director, Process Engineering
GNR Incorporated
P.O. Box 64484
St. Paul, MN 55164

re: CAD097854541 (pt 2)

Dear Mr. Larson,

According to the information that you provided to us in our meeting on October 10, 1985, we have determined that you are not storing lead acid batteries. Because your facility is not considered a storage facility it is not subject to the requirements listed in CFR part 266.30(b).

As I mentioned in our meeting, it is important that you check with the California Department of Health Services to determine if any part of your process would require a state permit. If you have any questions about state regulations or state permit requirements, please contact:

John Masterman
California Department of Health Services
Toxic Substances Control Division
Program Management Section
714 P Street
Sacramento CA, 95814

If you have any further questions, please feel free to contact me.

Sincerely,

Original Signed By:

Michael T. Feeley
Chief, RCRA Programs Section

cc: ✓ John Masterman, CA DOHS

✓ Thomas Dent, Seyfarth and Shaw

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

7/11/85

Mr. John Masterman, Permits Coordinator
California Department of Health Services
Toxic Substances Control Division
714 "P" Street
Sacramento, CA 95814

RE: GNB Batteries, Inc. RCRA Part A Application

Dear Mr. Masterman:

I am enclosing copies of GNB Batteries, Inc. RCRA Part A application which was filed because of the January 4, 1985 regulations regarding the re-definition of Solid Waste.

Because California is partially authorized to run the Federal program, the January 4, 1985 regulations become effective when California amends its rules to adopt the new requirements. Therefore, permit applications are not required at this time in California.

If you have any questions, please contact Judy Walker of my staff at (415)974-8015.

Sincerely,

Michael T. Feeley, Chief
RCRA State Programs Section

cc: Mr. Kenneth G. Clark,
GNB Batteries, Inc.

Branch File T-2
Division File T-1
Author Walker T-2-1



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Gray Davis
Governor

December 13, 1999

Certified Mail

Mr. Jim Marzolino
GNB Technologies, Inc.
2700 S. Indiana Street
Vernon, California 90058

APPROVAL OF CLASS 2 INTERIM STATUS MODIFICATION AT GNB
TECHNOLOGIES, INC. VERNON FACILITY, 2700 S. INDIANA AVENUE, VERNON,
CALIFORNIA, EPA ID NUMBER CAD 097 854 541

Dear Mr. Marzolino:

The Department of Toxic Substances Control (DTSC) has approved your Class 2
Interim Status (IS) Modification application for Vernon Facility to authorize:

- (1) installation of a drop-out box system in the southwest corner of the Central Container Receiving Building (an IS container storage area), which intercepts the flow of storm water from the site and allows sediment, which may contain lead particulates, to drop out of the storm water prior to entering the on-site storm water retention pond. The system includes one 930-gallon stainless steel in-ground sump and four 9,000-gallon above-ground high density cross-link polyethylene resin storage tanks;
- (2) the expansion of the facility's existing Reverb Furnace Feed Room from 3,222 cubic yards to 4,379 cubic yards (a footprint area increase of 16,325 square feet to 29,479 square feet), the construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms, and a truck wash station adjacent to the feed room expansion to further reduce the fugitive emission of lead particulate from the facility;
- (3) reduction of storage capacity at the Central Container Receiving Building from 180,060 gallons to 168,978 gallons with a reduced storage area from 12,000 square feet to 10,600 square feet; and

Mr. Jim Marzolino
GNB Technologies, Inc.
December 13, 1999
Page 2

- (4) elimination or closure of the Canopied Container Receiving Building that encompasses the area of 5,460 square feet and that has a storage capacity of 77,712 gallons.

The activities set forth above shall be conducted in accordance with the approved Temporary Authorization Application Request for a Class 2 Modification for GNB Technologies Inc. (GNB) Interim Status Facility in Vernon, California, EPA ID No. CAD097854541, dated August 6, 1999.

The announcement of a 60-day comment period to invite the public, community group, and interesting party to be involved in the decision of this Class 2 Modification approval was published in LA Times, and La Opinion in Spanish, on August 18, 1999, and August 20, 1999, respectively. GNB had an informational meeting on September 22, 1999.

DTSC prepared and distributed a proposed Negative Declaration (ND) for this Class 2 IS Modification to the State Clearinghouse, Governor's Office of Planning and Research; local agencies; and interesting groups on the facility mailing list on October 5, 1999.

On November 15, 1999, the State Clearinghouse noticed DTSC that at the end of the review period on November 12, 1999, no state agencies submitted comments on the proposed ND. However, there is one comment from the City of Vernon on the proposed Negative Declaration sent to this office on October 26, 1999.

Attached is a copy of letter from the City of Vernon (City), pertaining to the proposed Negative Declaration for the Class 2 IS Modification project. The City requests that GNB submit a detailed operation and site plan explaining how GNB's operation will be expanded. The City will then make a determination regarding whether a conditional use permit will be necessary.

In order to comply with the requirements of the California Environmental Quality Act (CEQA), GNB must submit the requested information to the City of Vernon within thirty (30) days after receipt of the attached Response To Comments. GNB must also send a status report to DTSC within ninety (90) days of the City's determination regarding whether a conditional use permit will be required.

Mr. Jim Marzolino
GNB Technologies, Inc.
December 13, 1999
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The IS Modification for the GNB Technologies, Inc. Vernon Facility is attached.

If you have any questions, please contact Phil Chandler at (818) 551-2921 or
Liang Chiang at (818) 551-2964.

Sincerely,



Jose Kou, P.E., Chief
Southern California Permitting Branch
Hazardous Waste Management Program

Enclosure

Certified Mail
P 529 033 397
Return Receipt Requested

cc: Mr. Philip Chandler
Unit Chief
Southern California Permitting Branch
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Mr. Jim Marzolino
GNB Technologies, Inc.
December 13, 1999
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cc: FACILITY MAILING LIST FOR GNB TECHNOLOGIES, INC. VERNON
FACILITY, EPA ID NO: CAD 097 854 541

FACILITY

Mr. William L. Taylor
GNB Technologies, Inc.
375 Northridge Road
Atlanta, Georgia 30350

Mr. Thomas J.P. McHenry
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, California 90071

Mr. Jeffrey Pierce
Lake Engineering, Inc.
35 Glenlake Parkway, Suite 500
Atlanta, Georgia 30328

FEDERAL

Ms. Carmen Santos-Prior
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Kelvin Wong
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

STATE

Mr. Watson Gin, P.E.
Deputy Director
Hazardous Waste Management Program
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Rick Moss, Division Chief
Permitting Division
Hazardous Waste Management Program
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Ms. Denise Hoffman
Senior Staff Counsel
Office of Legal Counsel
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Ms. Florence Gharibian, Chief
Southern California Branch
Statewide Compliance Division
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Mr. Jim Marzolino
GNB Technologies, Inc.
December 13, 1999
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Mr. Randy Sturgeon
Public Participation Specialist
Public Participation Unit
Department of Toxic Substances Control
10151 Croydon Way, Suite 3
Sacramento, California 95827-2106

Mr. Guenther Moscat/ Ken Tipon, HQ-18
Office of Program Audits and
Environmental Analysis
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Liang Chiang, P.E.
Hazardous Substances Engineer
Southern California Permitting Branch
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

COUNTY

Mr. Bill Jones
L. A. County Fire Department
Hazardous Waste Control Program
5825 Rickenbacker Road
Commerce, California 90040

Mr. Joseph Baiocco
L.A. County Public Works Department
P.O. Box 1460
Alhambra, California 91802-1460

Mr. Frank Meneses
Impact Analysis Section
L.A. County Regional Planning Department
329 W. Temple Street
Los Angeles, California 90012

CITY

Mr. Peter Pirnejad, Planning Assistant
City Hall
4305 Santa Fe Ave.
Vernon, California 90058

Mr. Lewis Pozzebon
City of Vernon Health Dept.
4305 Santa Fe Ave.
Vernon, California 90058

Mr. Jim Marzolino
GNB Technologies, Inc.
December 13, 1999
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REGIONAL

Mr. David Bacharowski
Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Mr. Marco A. Polo
South Coast Air Quality Management
District
21865 E. Copley Drive
Diamond Bar, California 91765-4182

MANDATORY

Ms. Liz Allen
Sierra Club
394 Blaisdell
Claremont, California 91711

Ms. Bonnie Holmes
Sierra Club
1414 K Street, Suite 300
Sacramento, California 95814

Mr. David Roe
Environmental Defense Fund
Rockridge Market Mall
5655 College Avenue, Suite 304
Oakland, California 94618

Mr. Mike Belliveau
Communities for a Better Environment
500 Howard Street, Suite 506
San Francisco, California 94105

Ms. Jody Sparks
Toxics Assessment Group
P.O. Box 73620
Davis, California 95617

Ms. Diane Takvorian
Environmental Health Coalition
1717 Kettner Blvd., Ste. 100
San Diego, California 92101

Ms. Ann Coombs
League of Women Voters
65 Avalon Drive
Los Altos, California 94022

Mr. Victor Weisser
California Council for
Environmental & Economic Balance
100 Spear Street, Ste. 805
San Francisco, California 94105

Mr. Bradley Angel
Greenaction
1095 Market Street, Ste 608
San Francisco, California 94103

Ms. Mary Raftery
CALPIRG
926 J Street, Suite 713
Sacramento, California 95814

Mr. Jim Marzolino
GNB Technologies, Inc.
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Ms. Gwendolyn Eng, Regional
Representative
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Jane Williams
California Community Against Toxics
P.O.Box 845
Rosamond, California 93560

General Counsel
Planning and Conservation League
926 J Street, Suite 612
Sacramento, California 95814

Mr. John Bors
Morrison Knudsen Corporation
1 Market Plaza, Steuart Tower, Ste. 400
San Francisco, California 94105

Mr. Chuck White
Waste Management, Inc.
915 L Street, Suite 1430
Sacramento, California 95814



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control


Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201



Gray Davis
Governor

Facility:	GNB Technologies, Inc.)	
	2700 South Indiana Street)	<u>Interim Status Modification</u>
	City of Vernon, California 90023)	
Operator:	GNB Technologies, Inc.)	
	2700 South Indiana Street)	
	City of Vernon, California 90023)	Modification Effective Date:
		December 13, 1999

Pursuant to Section 25200.5 of the California Health and Safety Code, and Section 66270.72 of Title 22 of the California Code of Regulations, this Interim Status Modification is granted to GNB Technologies, Inc., subject to the conditions in Attachment A, which is composed of 2 pages, which by this reference is incorporated herein.



Jose Kuo, P.E., Chief
Southern California Permitting Branch
Hazardous Waste Management Program

Date

12/13/99

ATTACHMENT A**Modification to Interim Status (IS)**

**GNB Technologies, Inc. Vernon Facility
2700 South Indiana Street
Los Angeles County
City of Vernon, California 90023-0957**

I. GENERAL CONDITIONS:

GNB Technologies, Inc. hereinafter called the owner and/or operator, shall comply with applicable provisions of Chapter 6.5 and Chapter 6.8 of Division 20 of the California Health and Safety Code (H&SC). The owner and/or operator shall also comply with any rule, regulation, permit, covenant, standard, requirement, or order issued, promulgated, or executed thereunder and any amendments, including the applicable requirements for Interim Status Standards for Owners and Operators of Hazardous Waste Transfer, Treatment, Storage, and Disposal Facilities, Chapter 15, Division 4.5, Title 22 of the California Code of Regulations (CCR).

The issuance of this modification to IS does not release the owner and/or operator from any liability or duty imposed by federal or state laws, regulations or local ordinances. The issuance of this modification to IS does not relieve the owner and/or operator from complying with subsequently adopted or amended laws or regulations, administrative orders, or judicial orders which impose requirements which are in addition to or more stringent than those in existence when this modification to IS was issued. The owner and/or operator shall comply with any such additional or more stringent requirements in addition to the requirements and conditions specified in this document. The owner and/or operator shall provide and maintain financial responsibility in accordance with Article 8, Chapter 15, Division 4.5, Title 22 of the CCR.

II. SPECIAL CONDITIONS:

This IS modification authorizes the owner and/or operator to implement the following activities at the Vernon Facility site:

- (1) installation of a drop-out box system in the southwest corner of the Central Container Receiving Building (an IS container storage area), which intercepts the flow of storm water from the site and allows sediment, which may contain lead particulates, to drop out of the storm water prior to entering the on-site storm water retention pond. The system includes one 930-gallon stainless steel in-ground sump and four 9,000-gallon above-ground high density cross-link polyethylene resin storage tanks;
- (2) expansion of the facility's existing Reverb Furnace Feed Room from 3,222 cubic yards to 4,379 cubic yards (a footprint area increase of 16,325 square feet to 29,479 square feet), the construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms, and a truck wash station adjacent to the feed room expansion to further reduce the fugitive emission of lead particulate from the facility;
- (3) reduction of storage capacity at the Central Container Receiving Building from 180,060 gallons to 168,978 gallons with a reduced storage area from 12,000 square feet to 10,600 square feet; and
- (4) elimination or closure of the Canopied Container Receiving Building that encompasses the area of 5,460 square feet and that has a storage capacity of 77,712 gallons.

The activities set forth in this section shall be conducted in accordance with the approved Temporary Authorization Application Request for a Class 2 Modification for GNB Technologies Inc. Interim Status Facility in Vernon, California, EPA ID No. CAD097854541, dated August 6, 1999.



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Gray Davis
Governor

NOTICE OF DETERMINATION

To: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

From: Department of Toxic Substances Control
Office of Program Audits and Environmental Analysis
400 P Street, Fourth floor, room 4310
P.O. Box 806
Sacramento, CA 95812-0806

Project Title: GNB TECHNOLOGIES, INC. VERNON FACILITY, CLASS 2 INTERIM
STATUS MODIFICATION, EPA I.D. NUMBER: CAD 097 854 541

State Clearinghouse Number: 99101056

Contact Person and Telephone: Liang C. Chiang (818) 551-2964

Project Location: 2700 South Indiana Street
City of Vernon, California 90023-0957


Project Description: This project is a Class 2 Interim Status (IS) Modification to allow GNB Technologies, Inc. Vernon Facility to install a drop-out box system and implement a supplemental environmental project, referred to as the corridor project, to enclose dust generating activities.

Date project approved: December 13, 1999

This Notice of Determination is filed in compliance with Section 21108 of the Public Resources Code. The Department of Toxic Substances Control (DTSC), as lead agency, has approved the above described project and the attached Negative Declaration.

DTSC has made the determination that the project will not have a significant effect on the environment. The attached Negative Declaration was prepared for this project pursuant to the provisions of the California Environmental Quality Act.

A copy of this Negative Declaration may be examined at the above address of DTSC.

Signature:  Date: 12/13/99
Date received for filing at OPR:



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Gray Davis
Governor

NEGATIVE DECLARATION APPROVAL

Project Title: GNB TECHNOLOGIES, INC. VERNON FACILITY CLASS 2
INTERIM STATUS MODIFICATION

State Clearinghouse Number: 99101056

Contact Person and Telephone: Liang C. Chiang (818) 551-2964

Project Location: 2700 South Indiana Street
City of Vernon, California 90023-0957


Project Description: This project is a Class 2 Interim Status (IS) Modification to allow GNB Technologies, Inc. Vernon Facility to install a drop-out box system and implement the supplemental environmental project, referred to as the corridor project, to enclose dust generating activities.

The public review/comment period for the proposed Class 2 IS Modification project began on August 18, 1999, and ended on October 18, 1999. The draft Negative Declaration public notice began on October 5, 1999, and ended on November 12, 1999. The notice was published in local newspapers "Times Orange County" in English, and La Opinion in Spanish language, in order to invite the public and the community to be involved in the final decision for this project. One comments on the draft Negative Declaration was received during the public comment period. A Response To Comments was prepared.

The Department of Toxic Substances Control has found, on the basis of the Initial Study and comments received on the draft Negative Declaration, that there is no substantial evidence that this project will have a significant effect on the environment.

I hereby approve the Negative Declaration for this project.

Signature: _____


Jose Kou, Chief
Southern California Permitting Branch
Hazardous Waste Management Program
Department of Toxic Substances Control

Date: 12/13/99



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
400 P Street, 4th Floor, P.O. Box 806
Sacramento, California 95812-0806



Gray Davis
Governor

December 13, 1999

FINAL NEGATIVE DECLARATION
FOR
APPROVAL OF A CLASS 2 INTERIM STATUS MODIFICATION
AT
GNB TECHNOLOGIES, INC. VERNON FACILITY

Project Proponent

GNB Technologies, Inc.
2700 South Indiana Street
Vernon, California 90023

Contact Person:

James Marzolino
2700 South Indiana Street
Vernon, California 90023
(323) 262- 1101

Project Description

GNB Technologies, Inc. (GNB), has submitted a request to the Department of Toxic Substances Control (DTSC) for approval of an Interim Status (IS) Modification pursuant to Title 22, California Code of Regulations, Article 4, §66270.42(e). This request for a modification of the GNB IS facility has been determined by the DTSC to be a Class 2 modification. The following changes to the facility are included in the IS Modification request:

- 1) Installation of a Drop-out System to prevent sediment from entering and accumulating in the existing storm water pond; and
- 2) Implementation of a Supplemental Environmental Project (SEP) which will consist of:
 - a) expanding the size of and enclosing the existing Reverberatory Furnace Feed Room Building (Reverb Feed Room) which will result in increased storage of recyclable material in an enclosed building while minimizing the

necessity to store whole batteries in the Container Receiving Building and, thus, minimize the potential for fugitive emissions;

- b) construction of an enclosed corridor between the reconfigured Reverb Feed Room and the Blast Furnace Room to minimize the generation of fugitive emissions; and
- c) installation of a Truck Wash Sump to prevent the tracking of materials and release of fugitive emissions from the Feed Rooms due to vehicles leaving the building.

Facility Location

Located at 2700 South Indiana Street, the GNB facility is in the southern portion of Los Angeles County in the City of Vernon. Vernon has been developed as a city zoned for manufacturing, commercial, industrial, warehousing, slaughtering, and rendering uses. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The GNB facility is compatible with this zoning designation.

Mitigation Measures


The DTSC has determined that the project does not require any mitigation measures beyond those incorporated as part of the project.

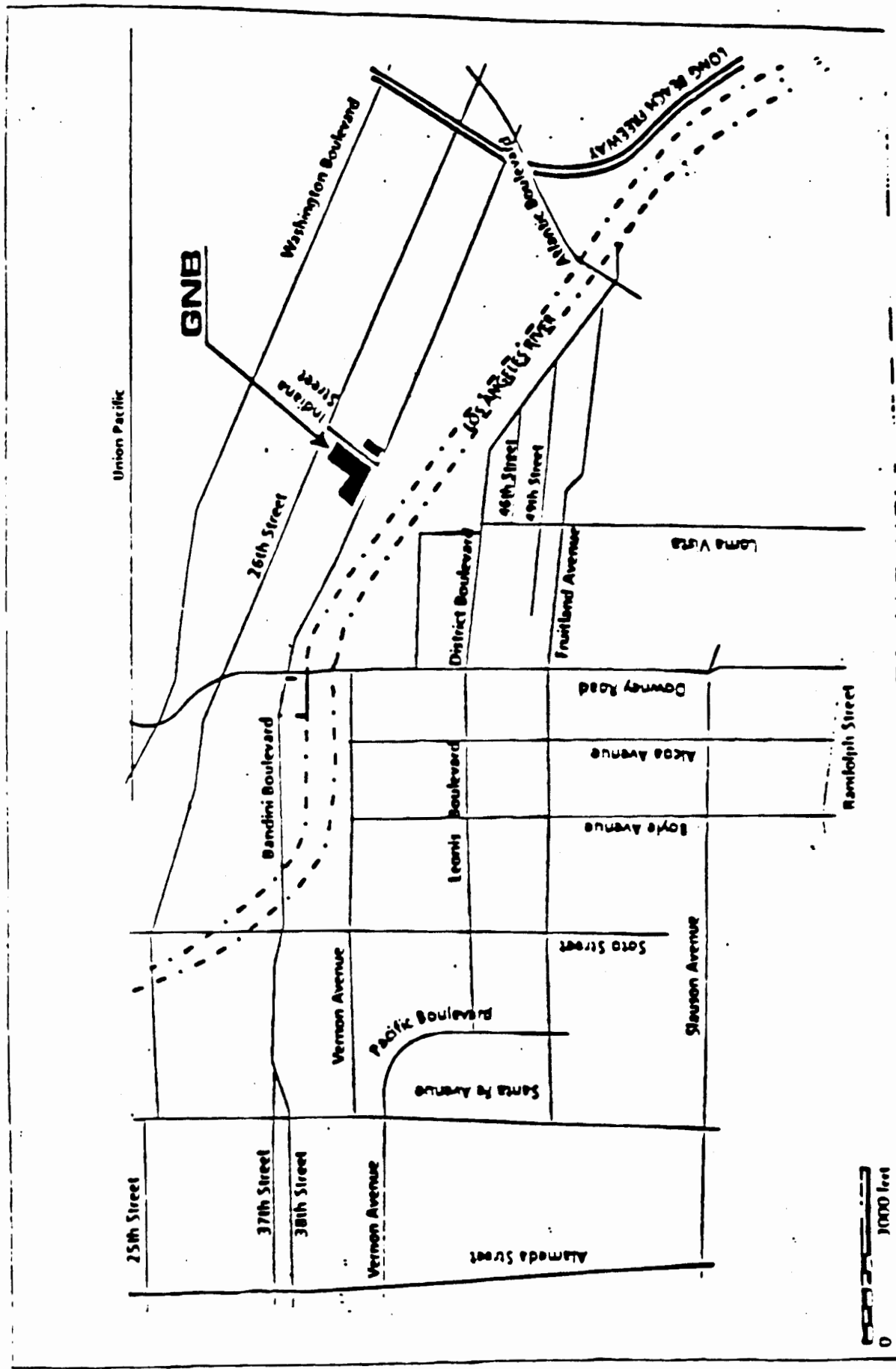
Findings of Significant Effect on the Environment

The DTSC has determined that the project will not have a significant effect on the environment as that term is defined in the Public Resources Code Section 21068.

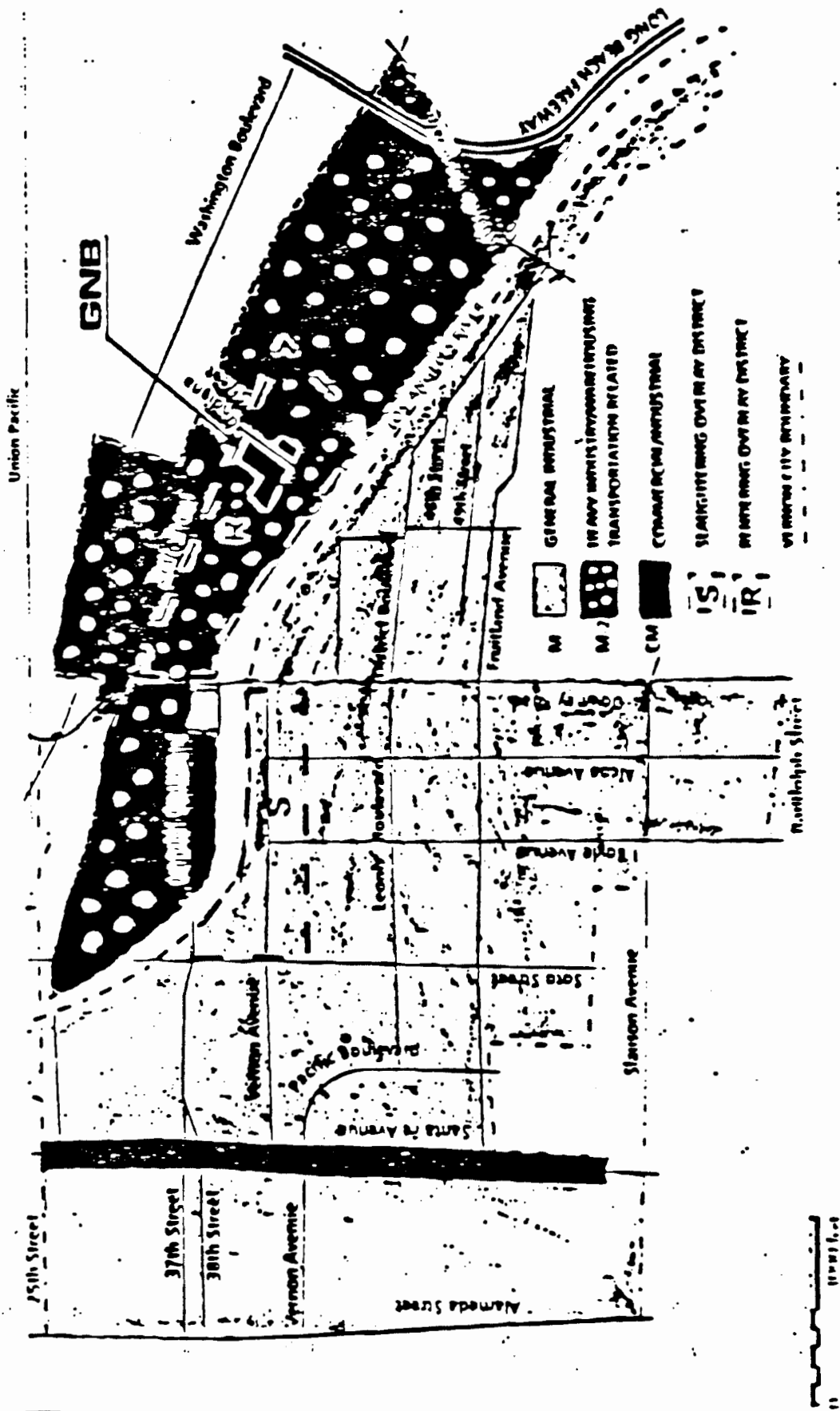
A copy of the Initial Study which supports this finding is attached.

Signature Liang C. Chang Date 12/9/99
Liang C. Chang, P.E.
Southern California Permitting Branch,
Department of Toxic Substances Control

 Signature Jose Kou Date 12/13/99
Jose Kou, P. E.; Branch Chief
Southern California Permitting Branch,
Department of Toxic Substances Control



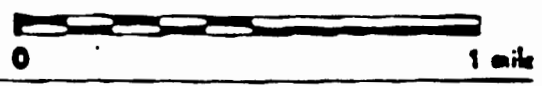
SITE LOCATION
GNB, INC.



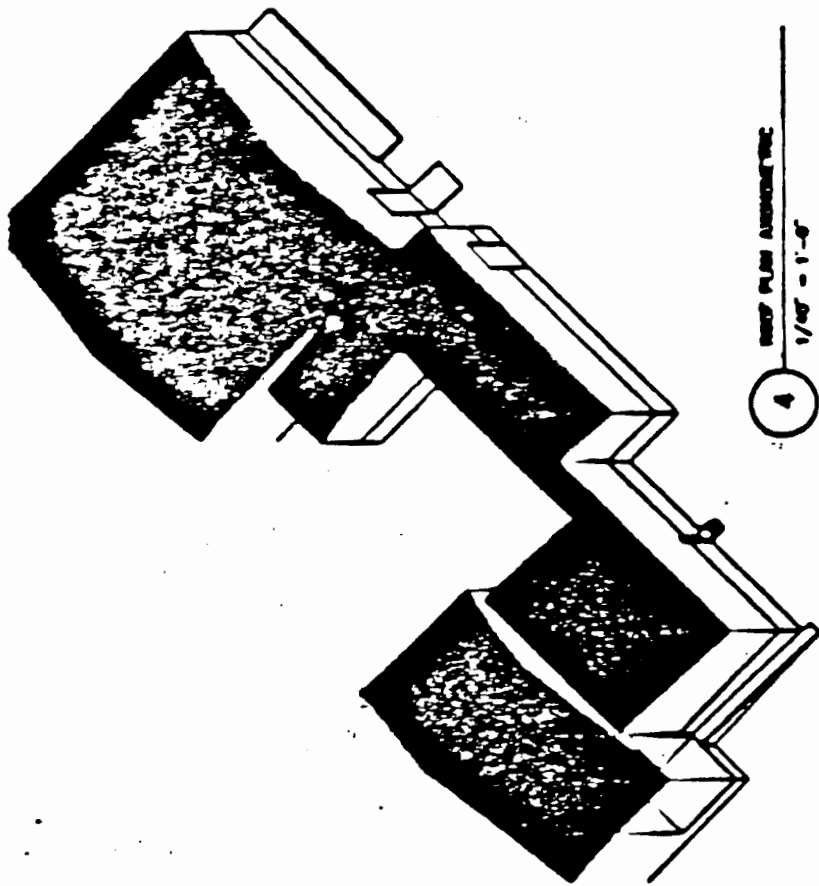
COMPREHENSIVE ZONING MAP
CITY OF VERNON



① Noise Sampling Location



GNB, INC.
NOISE SAMPLING LOCATIONS



4
3D PLAN ARCHITECTURE
1/4" = 1'-0"

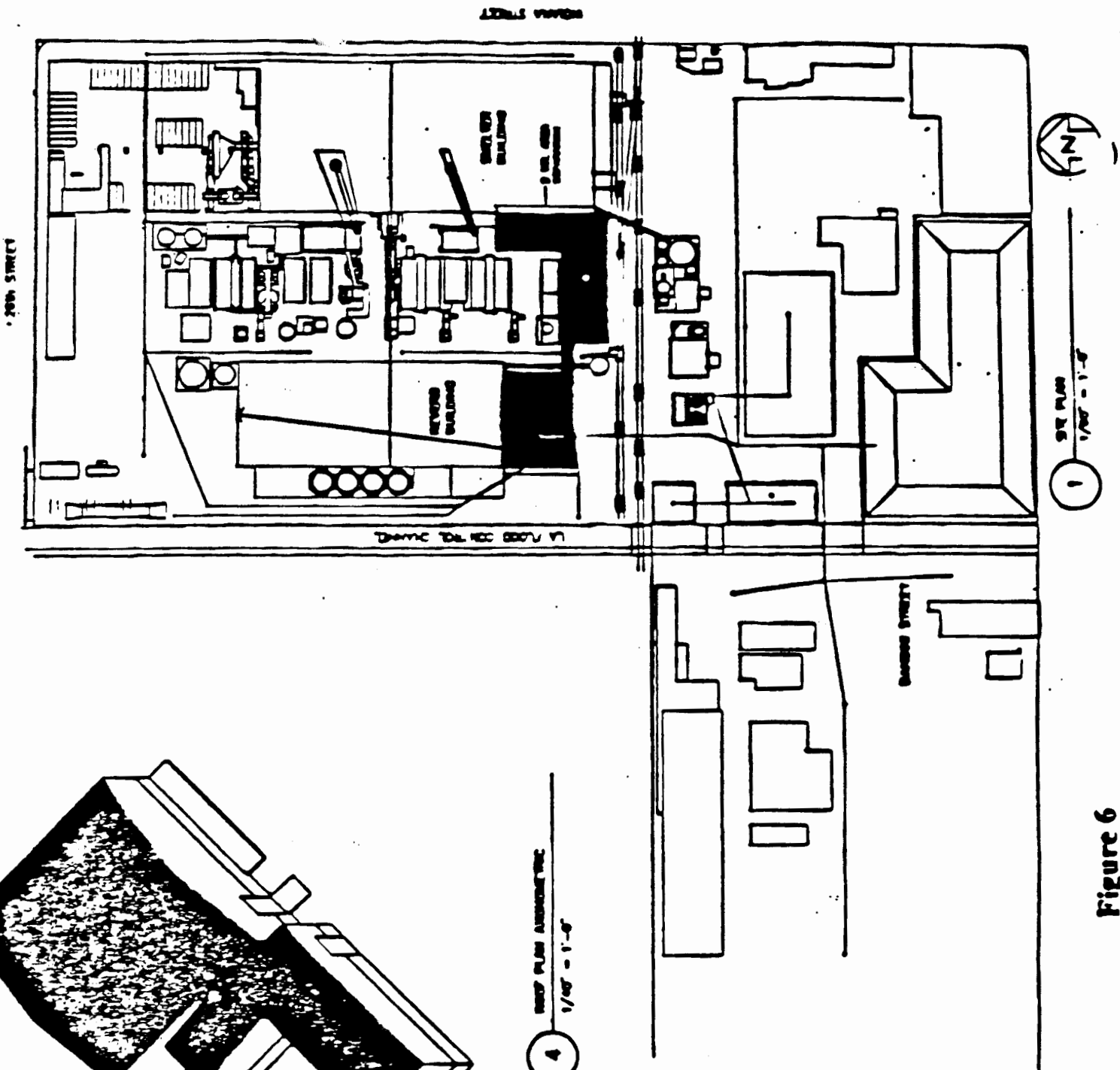


Figure 6

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
For
APPROVAL OF A CLASS 2 INTERIM STATUS MODIFICATION
FOR
GNB TECHNOLOGIES, INC. VERNON FACILITY**

The Department of Toxic Substances Control has completed the following Initial Study for this project in accordance with the California Environmental Quality Act (§ 21000 et seq., California Public Resources Code) and implementing Guidelines (§ 15000 et seq., Title 14, California Code of Regulations).

I. PROJECT INFORMATION:

Project Name: GNB Technologies, Inc.
Site Location: 2700 South Indiana Street
Vernon, California 90023
Contact Person: James Marzolino
Address: 2700 South Indiana Street
Vernon, California
Phone Number: (323)262-1101

Project Description:

GNB Technologies, Inc. (GNB) submitted a request to the Department of Toxic Substances Control (DTSC) for approval of an Interim Status (IS) Modification pursuant to Title 22, California Code of Regulations (CCR), Article 4, §66270.42(e). This request for a modification of the GNB Interim Status has been determined by the DTSC to be a Class 2 modification. Included in the IS Modification request are the following facility changes:

- 1) Installation of a Drop-out System to prevent sediment from entering and accumulating in the existing storm water pond; and
- 2) Implementation of Supplemental Environmental Projects (SEPs) which consists of:
 - a) expanding the size of and enclosing the existing Reverberatory Furnace Feed Room Building (Reverb Feed Room) which will result in increased storage of recyclable material in an enclosed building while minimizing the necessity to store whole batteries in the Container Receiving Building and, thus, minimize the potential for fugitive emissions;

- b) construction of an enclosed corridor between the reconfigured Reverb Feed Room and the Blast Furnace Room to minimize the generation of fugitive emissions; and
- c) installation of a Truck Wash Sump to prevent the tracking of materials and release of fugitive emissions from the Feed Rooms due to vehicles leaving the building.

The specific activities involved in the installation of the Drop-out System and the SEPs are described below:

Drop-out System:

Activities associated with the installation of the Drop-out System will consist of:

- 1) Demolition, excavation, testing and profiling, and disposal of a 20-foot by 70-foot by 1 foot section of an existing concrete pad, totaling approximately 50 cubic yards;
- 2) Excavation, testing and profiling, and disposal of approximately 100 cubic yards of soils;
- 3) Construction of a 20- by 70-foot, 24-inch thick reinforced concrete pad with tank foundations. A 16 inch high by 16 inch wide reinforced steel concrete berm will be constructed around the boundary to provide secondary containment;
- 4) Construction of a concrete vault with a 12-inch thick, reinforced steel concrete wall to a depth of 15 feet, within which will be placed a 930 gallon stainless steel tank which will serve as a liner;
- 5) Installation of a 10-foot section of 36-inch diameter double walled underground drain pipe connector to the existing underground drain pipe located at the manhole drainage sump. This section of pipe will connect to the concrete vault/ storage sump liner;
- 6) Installation of four 9,000-gallon each capacity (36,000 gallon total) above-ground settling tanks;
- 7) Installation of three sump pumps (100, 500 and 1,000 gallons per minute) in the storage sump;
- 8) Installation of all above-ground piping associated with the installation of the Drop-out System, four settling tanks and three sump pumps; and
- 9) Installation of new utilities and tie-ins to the existing utilities.

Supplemental Environmental Projects (SEPs):

Activities associated with the SEPs consist of:

Corridor:

- 1) Dismantling of an existing 1,125-square foot sheet metal building;
- 2) Demolition of pavement/concrete (approximately 450 cubic yards) to allow for the construction of the footings, foundations, floor system and truck ramp/storage bin within the existing Blast Furnace Feed Room;
- 3) Demolition of a concrete dock located west of the existing Blast Furnace Feed Room (100 cubic yards);
- 4) Excavation of soils 4-foot wide by 700-foot long to a depth of 2-foot (approximately 200 cubic yards) for footings and foundations. Over-excavation may be required, contingent on results of soil samples analyses;
- 5) Sampling, testing and profiling of demolition and excavated materials prior to disposal or reuse;
- 6) Construction of rebar-reinforced concrete footings, foundations (for building, framing and enclosure) and floor systems (1,700 total cubic yards of concrete);
- 7) Construction of the Reverb Furnace Feed Room expansion and installation of a liner system consisting of a 60-mil HDPE Geomembrane;
- 8) Construction of an enclosed corridor building;
- 9) Installation of additional ventilation with 100,000 cubic feet per minute capacity added to the existing ventilation system;
- 10) Construction of a concrete ramp and storage bin within the Blast Furnace Feed Room; and
- 11) Installation of new utilities and tie-ins to the existing utilities;

Truck Wash Sump:

- 1) Demolition of approximately 10 cubic yards of pavement/concrete;
- 2) Excavation of approximately 80 cubic yards of soils;
- 3) Sampling, testing and profiling of demolished and excavated materials prior to

disposal or reuse;

- 4) Construction and installation of a 571 cubic feet (4,277 gallon capacity) reinforced concrete Truck Wash sump with secondary containment and leak detection system. The dimensions of the sump will be 30-foot by 9-foot. The walls of the sump will be 12-inch thick. The sump will range in depth from 1.67-foot to 2.8-foot below ground surface; and
- 5) Installation of a liner system consisting of a 60-Mmill HDPE Geomembrane.

PROJECT ACTIVITIES:

A total of approximately 390 cubic yards of soils and approximately 625 cubic yards of concrete and/or pavement are planned for excavation and demolition, respectively, for all activities of this project. Samples will be taken of all excavated soils and pavement/concrete during project activities. These samples will be tested and profiled for contamination before final disposition of excavated materials.

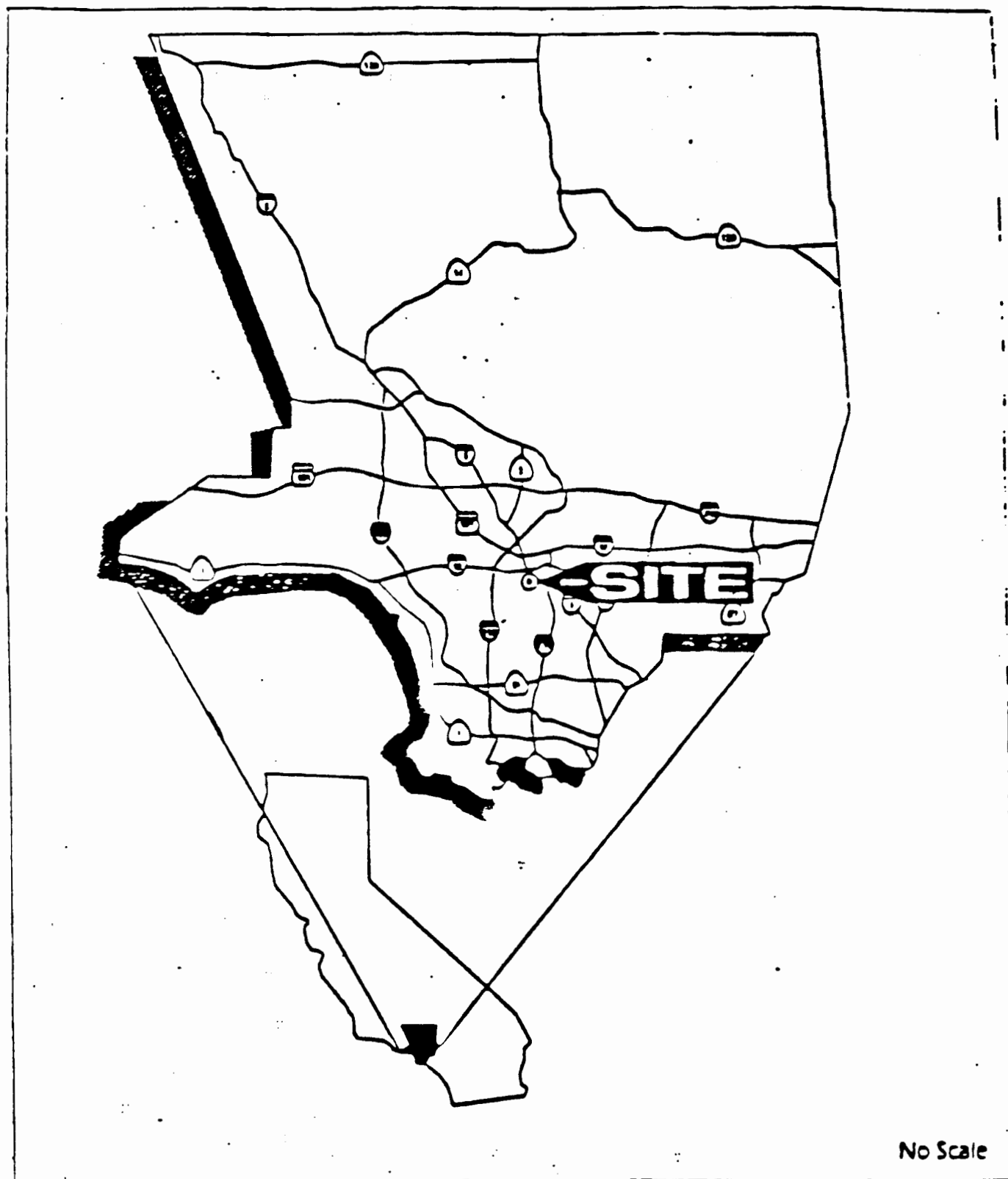
Perimeter fence monitoring will be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities. As a result of excavation and demolition activities, it may be necessary to provide project work area containment to prevent the release of airborne dust. All perimeter fence monitoring will be implemented pursuant to an approved DTSC schedule. All excavated soils will be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site.

All hazardous waste, contaminated soils and demolished concrete/pavement materials will be transported by a certified/licensed hazardous waste hauler to a permitted disposal facility. Federal Department of Transportation (DOT) approved trucks will be used to transport excavated soils, concrete and/or pavement and shall be currently registered with the DTSC for transporting hazardous wastes. Containerized loads will be lined and will be covered at all times to prevent fugitive dust emissions. Any remaining non-contaminated soils will be used for backfill or transported off-site for final deposition.

All equipment used in the demolition and excavation phases of this project will be decontaminated daily at the conclusion of all project activities as specified pursuant to CCR, Article 7, §66264.114. All construction activities will be performed in strict compliance with the latest revision of the Uniform Building Code and any other pertinent codes and/or regulations as set forth by the City of Vernon, Department of Building and Safety.

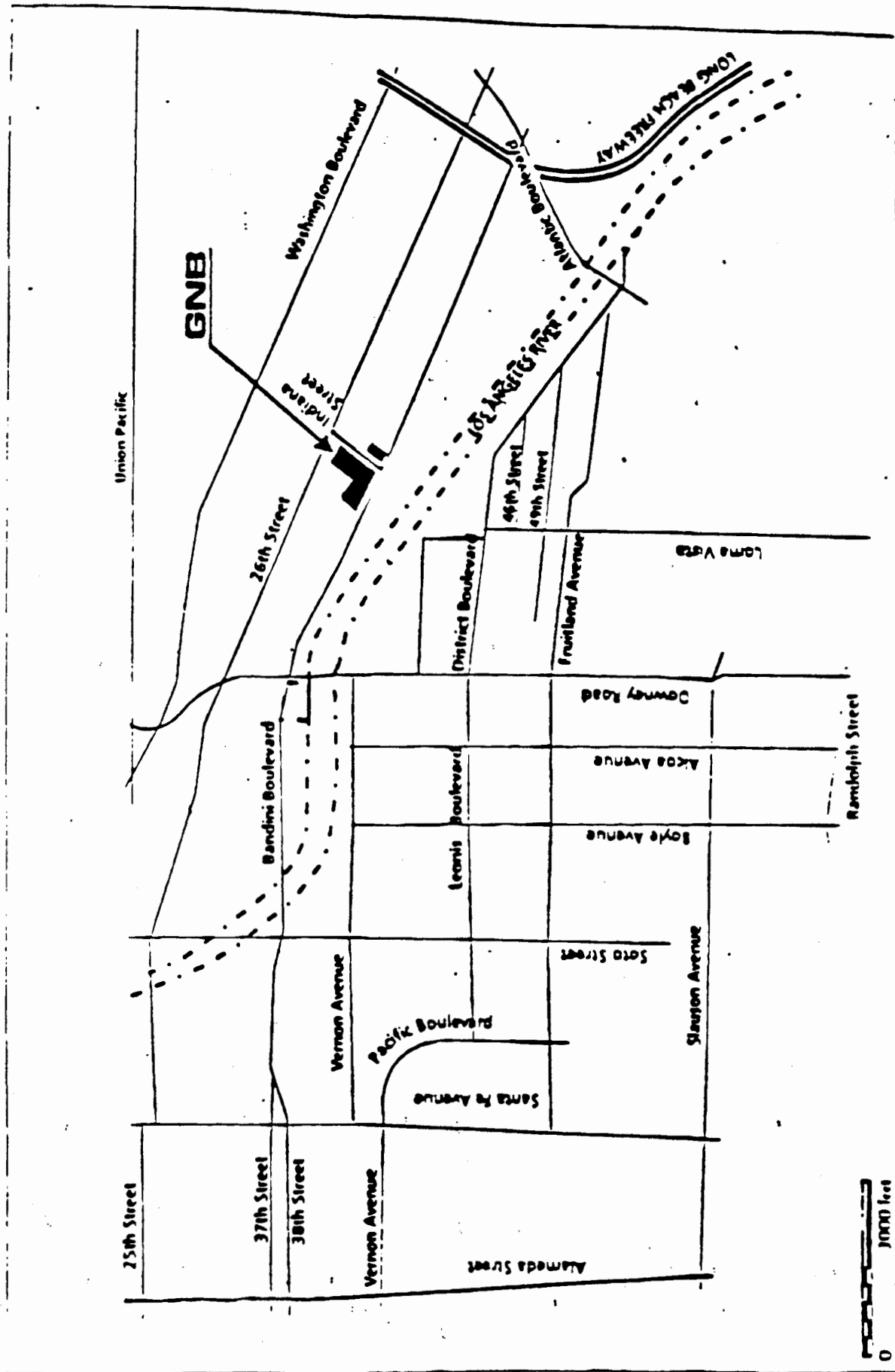
Drop-out System:

Project activities associated with the Drop-out System are anticipated to last approximately 18 weeks from project implementation to completion. Duration of excavation and demolition will be approximately 2 weeks. Construction equipment (i.e. vehicles) to be used for this project include one

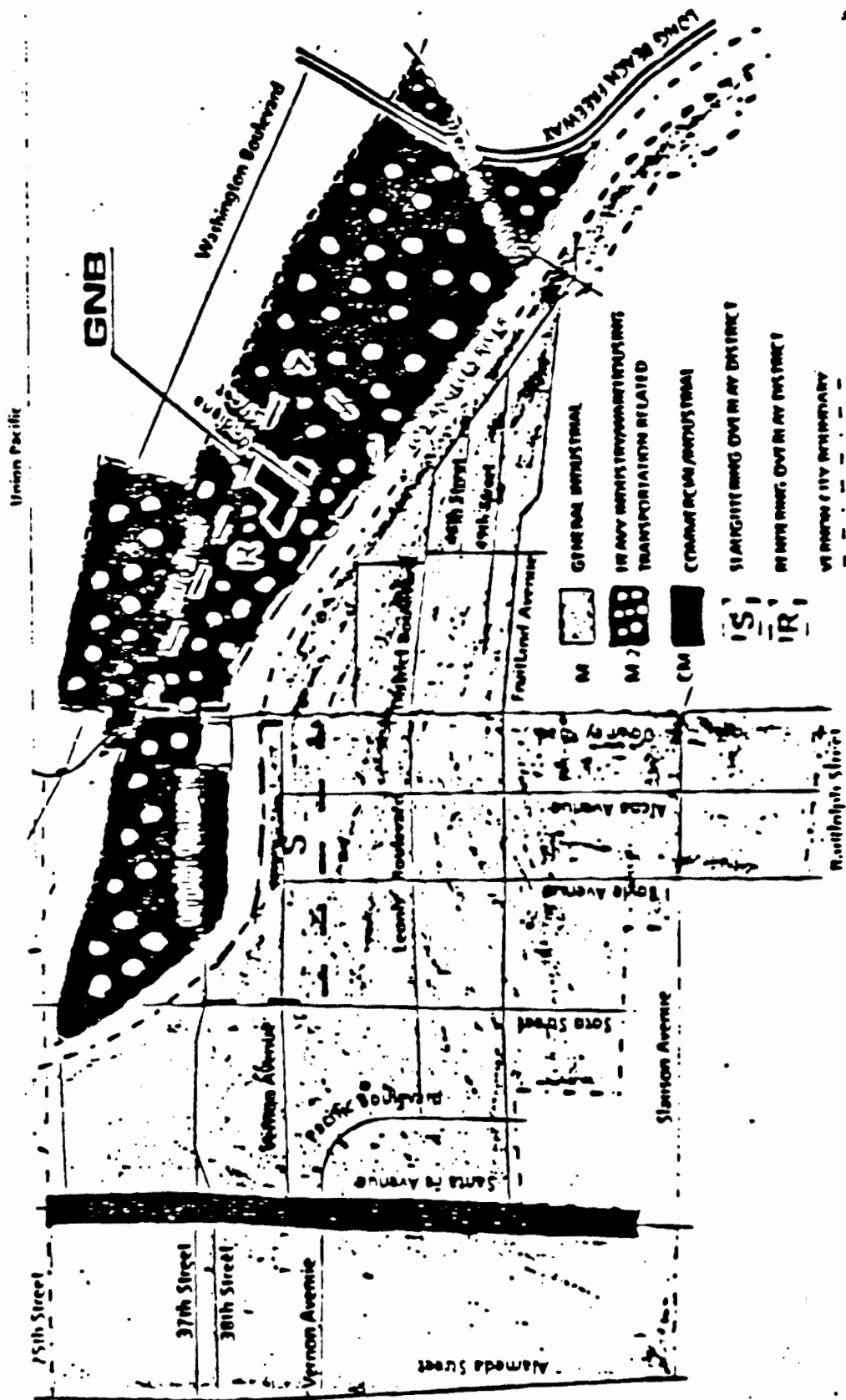


REGIONAL MAP

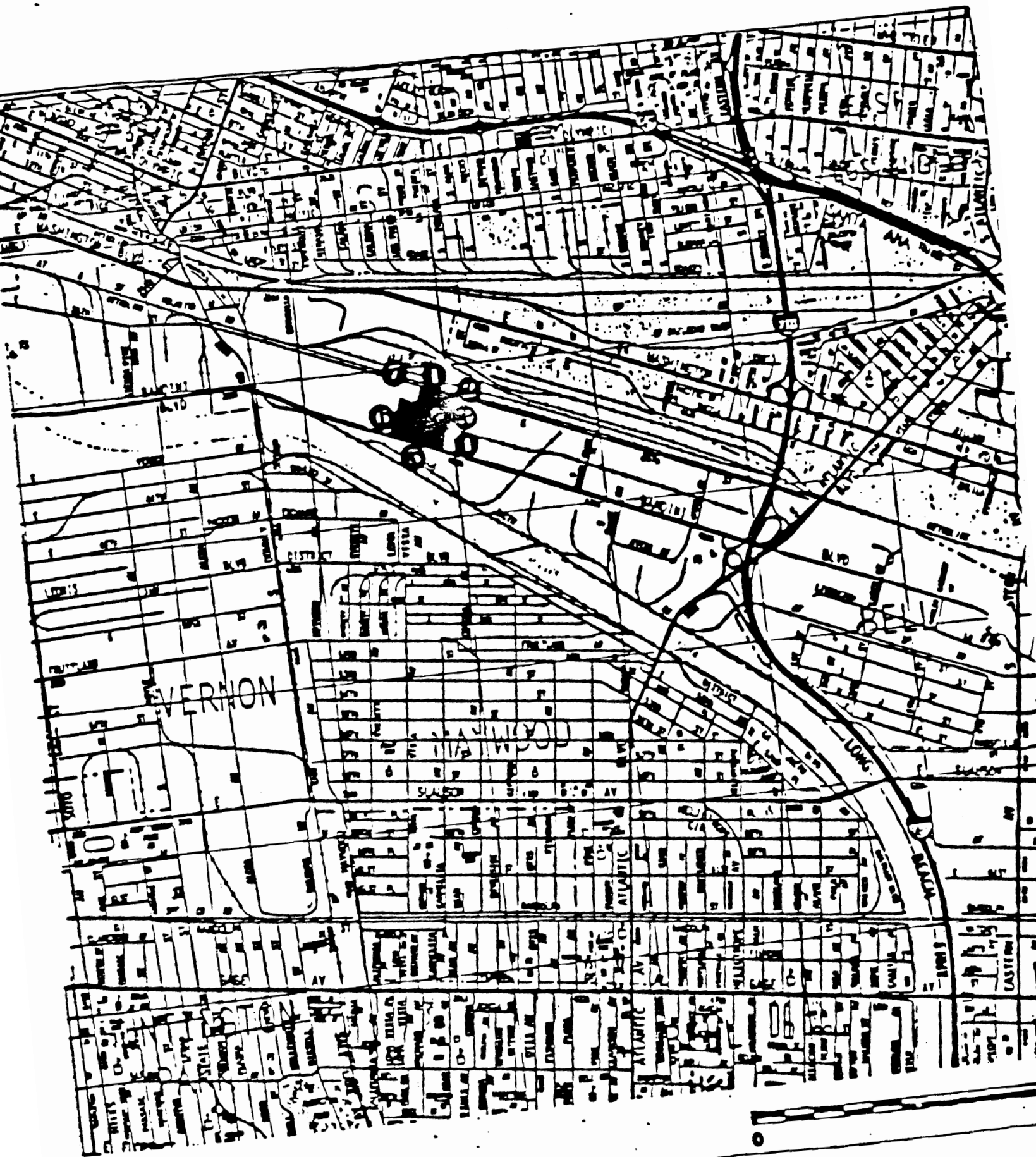
LOS ANGELES COUNTY



SITE LOCATION
GNB, INC.

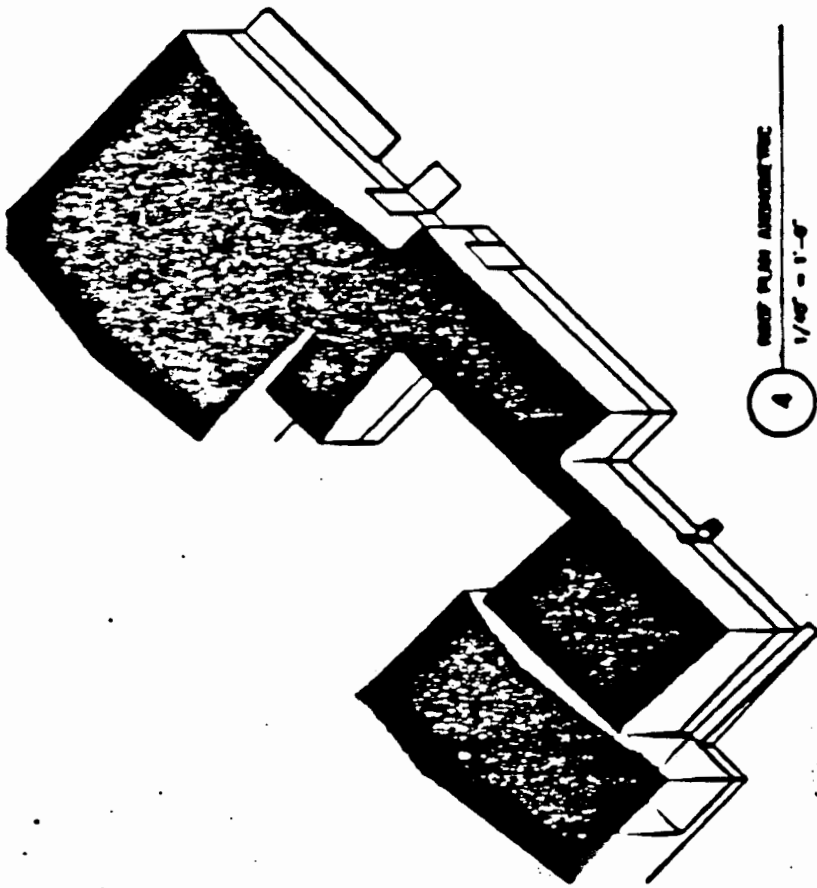


COMPREHENSIVE ZONING MAP CITY OF VERNON



① Noise Sampling Location

GNB, INC.
SAMPLING LOCATIONS



4
3D PLAN ARCHITECTURE
1/8" = 1'-0"

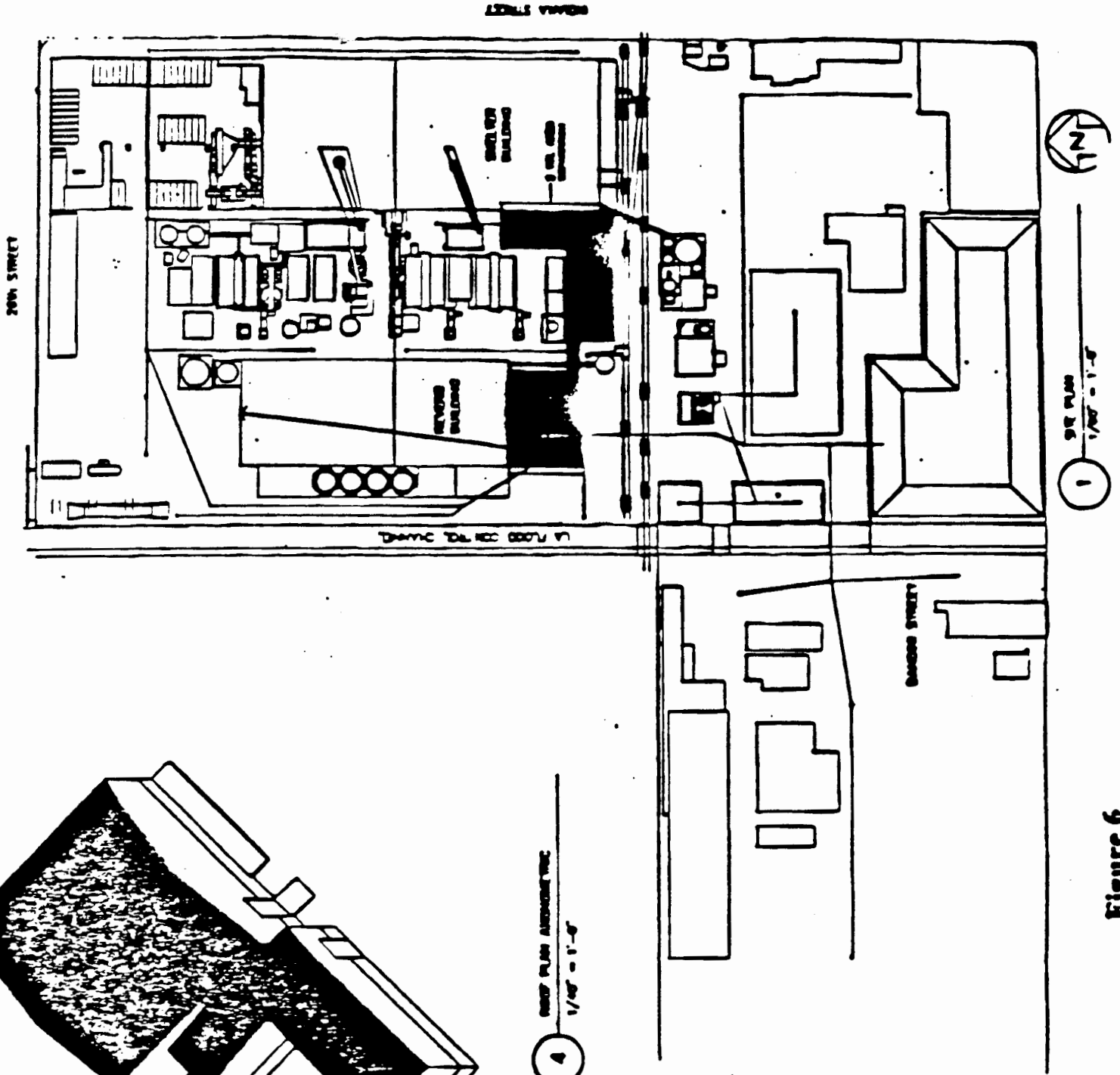


Figure 6

backhoe primarily for excavation soils and demolition of pavement and concrete.

Approximately 150 cubic yards of soil and concrete/pavement will be excavated before installation of the Drop-out Box System requiring 15-20 trucks to transport materials. Actual transport of these materials will be dependent on when sampling and profiling results are completed.

The volume of concrete necessary to complete the 20-foot by 70-foot concrete pad, tank foundations and footings is estimated to be about 100 cubic yards requiring a total of approximately 10-12 concrete truck deliveries to the site. The forming and pouring of foundations, pit and berm will take approximately 2.5 weeks. Deliveries by concrete trucks will be scheduled to reduce extended truck delivery times and eliminate unnecessary traffic impacts. Duration of the concrete deliveries will be short and temporary lasting no more than one or two days.

The four settling tanks will have a total maximum permitted storage capacity of 36,000 gallons and will be constructed of high density crosslink polyethylene (XLPE) resin. Each tank will be 10-foot in diameter and 17-foot high (not including tank stand). The tanks will be elevated on support structures which will be supported on reinforced concrete foundations.

The secondary containment vault for the stainless steel liner will be constructed of concrete at a depth of approximately 15 feet. The dimensions of the vault will measure 10-foot wide by 14-foot long by 15-foot deep. The existing manhole sump drain pipe will be connected to the newly constructed secondary containment vault. A leak detection probe system will be placed between the vault and the stainless steel liner.

A 16-inch high steel reinforced concrete berm will be constructed around the boundary of the concrete pad which will be used for the Drop-out Box System.

Drop-out Box System Process: The wash-down water and storm water management system discharges which are collected at various points across the site and will convey to the newly constructed Drop-out Box instead of directly flow into the retention pond. The Drop-out settling tanks will receive the collected water pumped from the Drop-out Sump. In the settling tanks, solids will be removed by gravity separation and will collect at the bottom of the tank. The process is the same for all four settling tanks. After separation of particulates, water from each of the four tanks will flow into the double-lined, leak-detected storm water retention pond through four 8-inch diameter overflow pipes (one pipe for each tank). It is expected that the water stream will leave the drop-out system and enter the retention pond only during heavy storm events. Solids collected in the bottom of the settling tanks, along with the water contained in the tank, will be removed from the tanks and be pumped to the on-site wastewater treatment plant for processing. A profile diadram of the settling tanks and the overflow pipe are indicated in attached Figure 5.

Corridor and Truck Wash Sump:

The Corridor (see Figure 6) is scheduled for completion within 8 months from initiation of project activities and will involve a phased activity schedule for project completion. The demolition and

excavation phase will be completed in approximately 3 weeks. Construction of the corridor footings, floor and sump is scheduled for completion within a 6 week period. Building construction and installation of all necessary appurtenances associated with the SEPs will involve 4 months of activity within the 8-month project completion timeframe.

The demolition and excavation phase will require the removal of approximately 865 cubic yards of excavated materials. These excavated materials include approximately 290 cubic yards of soils and about 575 cubic yards of concrete and pavement demolition material. A small amount of building/structure demolition materials (approximately 40 cubic yards) will be sampled and profiled and disposed of appropriately.

An estimated total of 1,600 cubic yards of concrete will be used to construct flooring, footings, containment walls and Truck Wash Sump. A double-lined leak detection system will be installed prior to installation of the floor and sump.

The sump will be structurally designed to withstand the weight of trucks and/or service vehicles that will enter and exit either the Blast or Reverb Furnace Feed Rooms. Cast iron steel grates (3 ½ inches thick) will be placed upon 1-foot thick, epoxy coated concrete support walls, and will allow wash water to enter into the sump. The sump will be constructed of 1-foot thick reinforced concrete that will be coated with three layers of Novalac epoxy (or equivalent).

Construction of the corridor building also includes a modification to the existing facility ventilation system. The newly modified structures will include ventilation capacity to provide for negative pressure within the building to prevent the release of fugitive emissions from the building openings. This new air pollution control system, approved by SCAQMD, consists of a dust collection system rated at 100,000 cubic feet per minute and will be vented to a new baghouse.

FACILITY HISTORY AND ENVIRONMENTAL IMPROVEMENTS:

The construction of the Reverb Furnace Feed Room (corridor) is necessary to fulfill an obligation as set forth in a Consent Judgment between GNB and DTSC. In the Consent Judgment, GNB committed to expend \$748,000 to implement certain Supplemental Environmental Projects (SEP) as approved by DTSC. The SEPs GNB committed to implement include: 1) construction of an expansion to the existing Reverb Furnace Feed Room; 2) construction of a connector or corridor between the Reverb and Blast Furnace Feed Rooms; and 3) construction of a Truck Wash Sump/Station adjacent to the Blast Furnace Feed Room.

The proposed construction will provide better management of incoming recyclable materials by reducing the quantity of material stored within the permitted Container Storage Areas. Construction of the corridor will also serve to reduce emissions of particulates and will also provide a more suitable method of minimizing potential impacts from material (tracking within the facility) to the environment with the protected movement of equipment between the two Feed Rooms.

The installation of the Drop-out Box System will improve the containment and treatment of on-site

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Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

surface run-off to prevent the lead-bearing sediments deposit in the retention pond, and provide additional environmental benefit to the facility. This aspect of the project, although not required by the Consent Judgment is considered by both DTSC and GNB to be a significant improvement to the overall management of surface water run-off at the facility.

GNB will be proposing to upgrade the existing wastewater treatment plant and secondary containment to ensure adequate secondary containment for all permitted tanks and to centralize wastewater treatment in a single location. The proposed system will be installed at the existing wastewater treatment system location and will replace and enlarge the existing system. This proposed modification to the facility will require the closure of several existing ISD permitted tank units which will be replaced by the new system. The environmental impacts associated with activities involved with construction and implementation of the wastewater treatment plant and secondary containment will be addressed under a separate CEQA analysis at the time the ISD Modification request is submitted and accepted as complete by DTSC.

Agencies Having Jurisdiction Over the Project/ Types of Permits Required:

South Coast Air Quality Management District/ Facility Permit to Operate.
City of Vernon/ Building Permits.

II. DISCRETIONARY APPROVAL ACTION BEING CONSIDERED BY DTSC

- | | |
|--|---|
| <input type="checkbox"/> Initial Permit Issuance | <input type="checkbox"/> Removal Action Plan |
| <input type="checkbox"/> Permit Renewal | <input type="checkbox"/> Removal Action Workplan |
| <input type="checkbox"/> Permit Modification | <input type="checkbox"/> Interim Removal |
| <input type="checkbox"/> Closure Plan | <input checked="" type="checkbox"/> Other (Specify) |
| <input type="checkbox"/> Regulations | <i>Class 2 IS Modification</i> |

Program/ Region Approving Project:

Department of Toxic Substances Control
Hazardous Waste Management Program
Southern California Permitting Branch

Contact Person/ Address/ Phone Number:

Liang Chiang, P.E.
Department of Toxic Substances Control
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, CA 91201
TEL: (818) 551-2964

III. ENVIRONMENTAL CONDITIONS POTENTIALLY AFFECTED:

The boxes checked below identify environmental factors which were found in the following ENVIRONMENTAL SETTING/IMPACT ANALYSIS section to be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigated".

- | | | |
|--|--|--|
| <input type="checkbox"/> Earth | <input type="checkbox"/> Risk of Upset | <input type="checkbox"/> Aesthetics |
| <input type="checkbox"/> Air | <input type="checkbox"/> Transportation/ Circulation | <input type="checkbox"/> Cultural/ Paleontological Resources |
| <input type="checkbox"/> Surface and Groundwater | <input type="checkbox"/> Public Services | <input type="checkbox"/> Cumulative Effects |
| <input type="checkbox"/> Plant Life | <input type="checkbox"/> Energy | <input type="checkbox"/> Population |
| <input type="checkbox"/> Animal Life | <input type="checkbox"/> Utilities | <input type="checkbox"/> Housing |
| <input type="checkbox"/> Land Use | <input type="checkbox"/> Noise | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Natural Resources | <input type="checkbox"/> Public Health and Safety | <input type="checkbox"/> None Identified |

IV. ENVIRONMENTAL SETTING/ IMPACT ANALYSIS:

The following pages provide a brief description of the physical environmental conditions which exist within the area affected by the proposed project and an analysis of whether or not those conditions will be potentially impacted by the proposed project. Preparation of the Environmental Setting and Impact Analysis sections follows guidance provided in the DTSC's Workbook For Conducting Initial Studies Under the California Environmental Quality Act (CEQA), October 1996 (Workbook). A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each environmental factor discussed below.

Mitigation measures which are made a part of the project (e.g. permit condition) or which are required under a separate Mitigation Monitoring Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each environmental factor.

1. Land Use (Workbook; page 24)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (See Figure 1 and 2). The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/ warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plants and junk/salvage yards (See Figure 3). The GNB site is buffered by other industrial areas from the nearest residential uses which are about 0.75 miles away from the facility. The facility is bounded to the north by East 26th Street and the Atchison, Topeka and Santa Fe Railroad Yard; to the south by Bandini Boulevard; to the east by Indiana Avenue; and to the west by Pioneer Aluminum.

Ref: RCRA Facility Assessment, 1990.
City of Vernon, General Plan, 1992.

Analysis of Potential Impacts:

The proposed project does not alter present or planned land uses. Excavation and construction activities planned will not change the pattern, scale, or character of the general vicinity. Construction is on the existing facility site and will consist of like-materials and have the same architectural elevation as existing structures on site. Project activities are consistent with and are compatible with existing land uses. Therefore, the project will have no impact on current land use.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2. Earth (Workbook; page 11)

Description of Environmental Setting:

The GNB site is covered by impervious surfaces including asphalt, concrete, buildings and their foundations. Lead recycling and smelting activities have been conducted at the site since 1922. The original grading of the site occurred prior to 1922 to provide a flat surface for facility operations.

The general topography of the Vernon area is flat with no major hills or areas with elevated topography. No unique geological resources (paleontological resources or unique outcrops) are present at the site or in the general Vernon area that could be disturbed by the continued operation of the facility or the construction of the proposed modifications.

The GNB facility is located in the seismically active area of Southern California. No faults or fault-related features are known to exist on-site. The site is not located in an Alquist-Priolo Special Studies Zone and is not expected to be subject to significant surface fault displacement. There are no other known geological hazards at the GNB site or in the Vernon area including landslides or mudslides because the topography of the area is flat.

The historic operation and past activities at the site have led to soil contamination as documented in the Resource Conservation and Recovery Act (RCRA) Facility Assessment (DTSC, 1990). GNB has been required to conduct a RCRA Facility Investigation to provide a more accurate evaluation of the type, extent, and potential sources of contamination at the site. GNB has submitted the work plan for the RCRA Facility Investigation to DTSC for review and approval.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Project activities include minor excavation and demolition of asphalt and concrete and a minimal amount of soil excavation for placement of footings and sump associated with the corridor building construction and placement of the Drop-out box system. These activities would result in a minimal degree of soil disturbance of a short-term nature. Further, since the site is located in a developed, industrialized area with what can be described as flat surface relief features and due to the limited nature of excavation and demolition activities, it is not anticipated that the project will destruct, cover or modify any geologic or physical features, nor are project activities expected to result in unstable earth conditions, change geologic substructures, create a change in topography or ground surface relief features or alter ground contours during construction, operation, dismantling, excavation, or grading. As such, project activities will have a less-than-significant impact on the geologic and physical features of the topography.

Standard construction practices will be utilized including the requirement to water active construction sites at least twice daily to minimize the potential for wind erosion and the possibility of the

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Hazardous Waste Management Program
Southern California Permitting Branch
1011 North Grandview Avenue
Glendale, California 90201
TEL: (818) 551-2800

generation of fugitive dust. Implementation. The minimal amount of soil excavation and the short duration of excavation activities will reduce the likelihood of potential erosion, resulting in the project having a less-than-significant impact on earth.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. Air (Workbook; page 13)

Description of Environmental Setting:

The GNB facility is located in the South Coast Air Basin (Basin) which lies within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). GNB is currently operating under permits from the SCAQMD. The Basin is a coastal plain with a rim of mountains rising up to 11,000 feet. The area lies within the semi-permanent high pressure zone of the eastern Pacific. This climate generally is characterized by sparse winter rainfall and hot summers tempered by cooling ocean breezes. A temperature inversion which traps the cool marine air layer and prevents vertical mixing is the prime factor that allows air contaminants to accumulate in the Basin. The mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The climate of the area is not unique but the high concentration of mobile and stationary sources of air contaminants in the western portion of the Basin in addition to the mountains which surround the perimeter of the Basin, impacts the air quality of the region.

The annual average temperature varies little throughout the Basin, averaging 75 degrees Fahrenheit. Temperature affects the air quality of the region in several ways. Local winds are the result of temperature differences between the relatively stable ocean air and the uneven heating and cooling that takes place in the Basin due to a wide variation in topography. Temperature also has a major effect on vertical mixing height and affects chemical and photochemical reaction times.

Winds flow from offshore and blow eastward during the daytime hours. In summer, the sea breeze starts in mid-morning, peaks at 10-15 miles per hours and subsides after sundown. There is a calm period until about midnight. At that time the land breeze begins from the Northwest, typically becoming calm again about sunrise. In winter, the same general wind flow patterns exist except that summer wind speeds average slightly higher than winter wind speeds. This pattern of low wind speeds is a major factor which allows the pollutants to accumulate in the Basin.

The Basin complies with the state and federal standards for sulfur dioxide and sulfates. However, the Basin exceeds the ambient air quality standards for ozone, carbon monoxide, nitrogen dioxide and respirable particulate matter.

Ref: SCAQMD, CEQA Air Quality Handbook, April, 1993.
RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Vehicle / Equipment Emissions

The anticipated duration of excavation and demolition activities will be approximately 5 weeks. Site demolition, excavation and utilization of construction equipment will create temporary, short-term air quality impacts in the form of increased dust generation at the site during project activities. In

addition, the project will increase emissions created from vehicles used for demolition, excavation and construction activities, including:

- * 1- diesel backhoe at 60 percent utilization for 5 weeks;
- * 2- propane powered fork trucks at 60 percent utilization for a period of 8-10 weeks; and
- * 1- gasoline powered truck mounted crane to be used for delivery of construction materials for a period of 4 days.

The project will also require the delivery of construction materials resulting in an increase of trucks typically operating at the site. The total number of temporary truck deliveries to the site will be approximately 250 trucks (including cement trucks, dump trucks and flat bed trucks) over a period of about 8-9 months. Truck trips to and from the facility for purposes of making deliveries of construction materials will temporarily increase the number of trucks currently entering and exiting the facility during a normal business day. Currently approximately 60-80 trucks associated with GNB daily business activities arrive at and depart from the facility on a daily basis.

Over the duration of this project, it is estimated that the number of truck trips will be limited to an increase of approximately 4-5 per day (at the peak of delivery) and will increase the round-trip truck visits to the facility by an average of 1 truck per day during the period of project implementation. The number of worker vehicles associated with this project is anticipated to be approximately 15-40 vehicles. As a condition of the permit, GNB will require trucks making deliveries or hauling materials from the project site to be on a phased scheduled and staged to reduce or eliminate unnecessary emissions.

With the limited number of trucks associated with this project, temporary nature of the truck deliveries and worker trips and permit conditions incorporated into the IS Modification over the period of 8-9 months of project implementation, it has been determined that the project activities will have a less-than-significant impact on air quality.

Equipment (i.e. vehicle and equipment emissions) used for excavation, demolition and construction activities associated with this project are exempt under Rule 219, Equipment Not Requiring A Written Permit Pursuant to Regulation II, SCAQMD. Equipment usage will consist of standard construction tools/machinery during all construction phases.

Fugitive Dust

Project activities include the excavation and movement of approximately 380 cubic yards of soils and 625 cubic yards of demolition concrete and pavement. With the excavation and movement of these materials, there exists the possibility for generation of fugitive dust. Given the nature of the facility operations which generates hazardous wastes (i.e. lead), there is a possibility that the excavated materials could be considered hazardous and, therefore, pose the potential for adverse air impacts. Consequently, the IS Modification will contain the following permit conditions to reduce these impacts:

- 1) all excavated soils will be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site;
- 2) excavation and demolition areas shall be watered at least twice daily to prevent the generation of and prevent fugitive dust from leaving the site;
- 3) samples of excavated materials will tested and profiled for levels of contamination;
- 4) excavation and demolition activities may require work area containment to prevent the release of airborne materials; and
- 5) perimeter fence monitoring will be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities. These conditions to the permit will be required in order to ensure that any potential for adverse environmental impact from fugitive dust is reduced to a less-than-significant level.

In addition, during construction activities, water used as a dust suppressant will be applied in the construction area during excavation and earth-moving activities to reduce fugitive dust emissions. The use of water is a standard operating practice for fugitive dust suppression and is one method of complying with SCAQMD Rule 403 concerning reduction of fugitive dust.

Air Pollution Control System

The ventilation system to be installed as part of the Corridor project is a component of the air pollution control system at the facility and has been approved by the SCAQMD. Installation of this system (in conjunction with the corridor) will provide environmental benefits through reduction of fugitive emissions from the daily operation of the facility as required of the Consent Agreement between the Department and GNB.

Ref: SCAQMD, CEQA Air Quality Handbook, April, 1993.
SCAQMD, Mr. Marco Polo, January, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4. Surface and Ground Water (Workbook; page 17)

Description of Environmental Setting:

The GNB facility is located in the Coastal Plain of Los Angeles which consists mainly of unconsolidated sediments or alluvium underlain by and bounded on the north and east by essentially bedrock. The coastal plain has been divided into four groundwater basins by geologic and surface features. The GNB facility is located within the Los Angeles Forebay area which is part of the Central Ground Water Basin. The Los Angeles Forebay Area is located in the northern part of the Central Ground Water Basin immediately south of the two systems flow through these breaks from the north valleys into the Coastal Plain. The Forebay areas have been described as ground water recharge areas or areas of free or unconfined ground water.

The area around the GNB facility is reportedly underlain by the Lakewood and the San Pedro Formation. The Lakewood formation includes portions of the Bellflower aquiclude and the Exposition, Gardena, and Gage aquifers in order of increasing depth. Groundwater elevation measurements have been taken at the GNB site. The depth to ground water averages in the range of 85 to 90 feet below the ground surface.

Precipitation in the Los Angeles area occurs as rainfall, with most falling during the winter months. Precipitation generally flows into surface water channels or groundwater basins. The Los Angeles River is the only water body located in the Vernon area. Direct storm water and surface water discharges in the area flow into the Los Angeles River, which is located about 1,000 feet from the GNB facility. According to the Federal Emergency Management Agency (FEMA), the GNB site and the entire City of Vernon is not located within a 100-year or 500-year flood plain.

A portion of the flood control drainage system crosses the plant property, in the form of a covered box culvert and an adjacent open concrete drainage ditch. Surface water run-off at GNB is controlled within the facility by a 2,395,000 gallon storm water retention pond located on the southeast portion of the site. The pond was constructed with a double liner and leak detection system.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

No increase in the amount of wastewater is expected as a result of this project since there would be no modifications to the facility processes. The construction of the Drop-out Box System will take place during periods of dry weather. Any surface water drainage generated by the minimal use of water used for dust suppression during the temporary and short term construction of the concrete vault can be handled by the existing drainage system. Therefore, no significant impact on water quality is expected from construction activities for the corridor and Drop-out Box System.

Depth to ground water ranges between 85 and 95 feet below the ground surface and will not be

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impacted by this project. The maximum depth of excavation for all project activities is 15 feet for construction of the Drop-out Box System. Therefore, activities associated with this project will not impact ground water.

Ref: GNB, IS Modification Application, August 06, 1999.
GNB, ADEIR, EA, Inc., April, 1996.

Findings:

Potentially Significant Impact <input type="checkbox"/>	Potentially Significant Unless Mitigated <input type="checkbox"/>	Less Than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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5. Plant Life (Workbook; page 20)

Description of Environmental Setting:

GNB is an existing facility located in the southern portion of Los Angeles County in the City of Vernon. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The locations of proposed site activities are paved and concreted areas that have been previously disturbed and which are void of any existing plants and habitats. A search of the Department of Fish and Game, Natural Diversity Database revealed no unique, rare or endangered species of plant at or near the project site.

Ref: RCRA Facility Assessment, 1990
NDDDB, Department of Fish and Game, May, 1999

Analysis of Potential Impacts:

Project excavation and construction activities will take place within the confines of the facility site in paved or concreted areas that have been previously disturbed and which are void of any existing plants and habitats. Therefore, project activities will not impact plant life.

Ref: NDDDB, Department of Fish and Game, May, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6. Animal Life (Workbook; page 22)

Description of Environmental Setting:

GNB is an existing facility located in the southern portion of Los Angeles County in the City of Vernon. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The locations of proposed site activities are paved and concreted areas that have been previously disturbed. A visual inspection of the facility did not reveal the presence of animal life or associated habitats. In addition, a review of the Department of Fish and Game, Natural Diversity Database indicates that there are no existing wildlife habitats, common characteristic animal species, sensitive species including rare, threatened, or endangered, commercially and recreational valued species, aquatic communities at or near the project site.

Ref: RCRA Facility Assessment, 1990.
NDDDB, Department of Fish and Game, May, 1999.

Analysis of Potential Impacts:

Project excavation and construction activities will take place within the confines of the facility site in paved or concreted areas that have been previously disturbed and which are void of any existing animal life and habitats. A security fence and gate surround the facility which would deter and prohibit the entry of animals. Therefore, project activities will not impact animal life.

Ref: NDDDB, Department of Fish and Game, May, 1999.

Findings:

Potentially Significant Impact <input type="checkbox"/>	Potentially Significant Unless Mitigated <input type="checkbox"/>	Less Than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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Natural Resources (Workbook; page 25)

Description of Environmental Setting:

GNB operates a lead recycling and smelting business. The facility is supplied with electricity by the City of Vernon and purchases approximately 24 million kilowatts of electricity annually. The facility uses water for dust suppression and the cleaning of equipment. Approximately, 12 million cubic feet of water is purchased GNB from the California Water Service. Facility operations also require the use of natural gas. The GNB facility purchases about 3 million therms annually.

Ref: RCRA Facility Assessment, 1990.

Analysis of Potential Impacts:

Project activities will require the use of standard construction equipment which would require the use of negligible amounts of electricity. In addition, construction activities will require the use of two propane powered forklift tractors at 60 percent utilization for about 8-10 weeks which would not consume significant amounts of propane. Additionally, this project will require the use of one diesel powered backhoe at 60 percent utilization for about 5 weeks which would not consume significant amounts of diesel fuel. Therefore, impacts to Natural Resources are expected to be less-than-significant.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Risk of Upset (Workbook; page 26)

Description of Environmental Setting:

The GNB facility is located in a heavy industrial area within the City of Vernon. The GNB facility is a manufacturer of lead-acid storage batteries, lead oxide and a smelter of secondary lead. A number of manufacturing and heavy industrial facilities are located near the facility site. In addition to adjacent industrial facilities, a number of major industrial facilities exist within five miles of GNB.

State regulations require the use of certified hazardous waste haulers for the transport of hazardous waste in California. Certified waste haulers are required to adhere to inspection and maintenance schedules and maintain sufficient insurance coverage.

GNB has a facility Contingency Plan as required under CCR, Title 22, §66264.51 that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of a hazardous constituent. The provisions of the Contingency Plan are carried out immediately whenever there is a fire, explosion or release of a hazardous constituent that could threaten human health or the environment. The following situations constitute an emergency requiring implementation of the contingency plan:

- * Injury to an employee
- * Major spills or material releases
- * Fires and explosions

Emergency procedures are executed for any event associated with hazardous materials or hazardous waste involving any possible danger to personnel, equipment or the environment.

The Contingency Plan addresses all of the issues required under CCR, §66264.52 including:

- * The actions facility personnel take in the event of an emergency.
- * Arrangements with the local authorities, hospitals, contractors, and state and local emergency response teams.
- * The names, addresses and telephone numbers of the designated Emergency Coordinator of the facility and the alternate contact.
- * A list of emergency equipment at the facility, with the location and physical description of each item and a brief outline of its capabilities.
- * An evacuation plan for the facility.

Ref: GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

Project activities include excavation and construction which will be within the perimeter of the facility.

All construction activities associated with the SEPs / Corridor and Drop-Out Box System will be performed in compliance with the latest revision of the Uniform Building Code and any other pertinent codes and/ or regulations set forth by the City of Vernon, Department of Building and Safety. GNB's Health and Safety Plan, as contained in the Contingency Plan, shall provide guidance for worker and public safety during the excavation, demolition and construction phases of this project.

The four 9,000 gallon settling tanks included in the Drop-Out Box System are to be installed on an approximately 20 feet by 70 feet concrete reinforced 24 inch thick foundation. As with any above ground tank, there is a potential that the tanks could release liquids due to a risk of upset condition. The installation of the foundation and support structures will be constructed in compliance with the latest revision of the Uniform Building Code, and in compliance with the City of Vernon, Department of Building and Safety. However, in the unlikely event a release does occur, as a condition of the ISD Permit Modification, the project proponent will be required to install a 16 inch high by 16 inch wide reinforced-steel concrete berm around the 20 feet by 70 feet perimeter of the four settling tanks (including the drop-out sump) to provide adequate secondary containment.

Implementation of the above requirements and operational controls are expected reduce the potential of any impact due to a risk of upset condition to a less-than-significant level.

Ref: RCRA Facility Assessment, 1990.
GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Transportation/Circulation (Workbook; page 29)

Description of Environmental Setting:

The regional highway network surrounding the GNB facility is shown in Figure 1. Two major freeways provide access to the site: Interstate 5 to the north and Interstate 710 to the east. The area also is served by a number of railroads. The Atchison Topeka and Santa Fe Railroad right-of-way runs east-west, north of GNB on the north side of E. 26th Street. Access to the project site is provided by Indiana Street, a local street which connects with Bandini Boulevard to the south and 26th Street to the north.

Traffic associated directly with GNB daily business activities include about 250 workers and about 60-80 trucks per day. Sufficient parking is provided for workers within the boundaries of the facility. Parking for permanent workers is provided on the site.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

It is estimated that approximately 250 truck trips to the facility are anticipated to occur over the 8-9 month project period. The number of project workers on the job at any one time will depend on the stage and/or phase of construction with the total number fluctuating between 15-40 during the 8-9 month project timeframe.

It is also estimated that approximately 170 concrete truck deliveries will be required for this project. However, because of the phased construction plans of this multi-phased project, the delivery of concrete will be staged to accommodate the construction scheduling. This will result in intermittent deliveries of short duration during a 10-11 week period of project activities (averaging approximately 3-3.5 deliveries per day). In addition, an estimated total of 6 truck deliveries of construction materials and supplies will be required during the 8-9 months period of this project. Deliveries by concrete trucks and material/ supply trucks will be scheduled during non-peak traffic times and will be phased throughout the workday. This short term, intermittent use of trucks for delivery of concrete will result in a less-than-significant impact on traffic/circulation.

It is estimated that approximately 600-800 cubic yards of soils, concrete and pavement materials from excavation and demolition will be containerized and hauled off site, requiring between 60-80 truck trips. The off-site hauling of the containerized materials will be phased and extended beyond the 5 week excavation/demolition period, thereby resulting in less-than-significant impacts on surrounding traffic/circulation.

Ref: GNB, IS Modification Application, August 06, 1999.
GNB, ADEIR, EA, Inc., April, 1996.

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Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Public Services (Workbook; page 31)

Description of Environmental Setting:

The City of Vernon Fire Department provides fire protection to the GNB facility. The City of Vernon Fire Department holds a mutual aid agreement with the Cities of Lynwood and Montebello. Should emergency backup fire protection be required, the Lynwood and Montebello Fire Departments will provide assistance. Each fire fighter has received training in all fire response aspects and generally trains on a daily basis to update fire fighting techniques. A majority of the fire fighters are trained as Emergency Medical Technicians. Paramedics in the area are contracted with private providers. On any shift, there are approximately nine fire fighters trained for hazardous materials responses. These Hazardous Materials Teams have received extensive training in the emergency response and handling of hazardous materials.

The City of Vernon Police Department has primary responsibility for police services for the GNB facility with the Huntington Park or Maywood Police Departments providing general police backup. In addition to public police departments, the GNB facility perimeter is secured to prohibit unauthorized entry to the site which has two operating gates for entry/exit to the facility.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

This project involves short-term, standard construction activities at an established lead recycling and smelting facility within the heavy industrial area of the City of West Covina. Project activities will not require an increase in existing public services and, therefore, will have no impact on public services.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Energy/ Utilities (Workbook; page 32)

Description of Environmental Setting:

GNB is supplied with electricity by the city of Vernon. In 1993, GNB purchased nearly 24 million kilowatts of electricity. The facility uses water for dust suppression and the cleaning of equipment. In 1994, GNB purchased 12.5 million cubic feet of water from the California Water Service. Enron Access supplies natural gas to GNB. In 1993, GNB purchased nearly 3 million therms from Enron Access for operation of the facility. (Also see discussion under 7. *Natural Resources*.)

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Analysis of Potential Impacts:

Activities associated with this project include excavation, demolition and building construction. Project activities will not require additional use or demand for fuel or energy and will not require new or expanded utility systems. Therefore, this project will have no impact on utilities. (Also see discussion under 7. *Natural Resources*.)

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise (Workbook; page 32)

Description of Environmental Setting:

The area surrounding the GNB facility is characterized by extensive, commercial and residential development and transportation corridors. The primary noise source in the area is attributed to vehicular traffic noise, with the highest noise contributor being the heavy truck traffic associated with industrial land uses. Vehicular traffic noise is significant on all roadways throughout the area, but the majority of the noise emanates from traffic on Bandini Boulevard. Other contributors to the ambient noise level in the general area include: 1) local railroads which run along East 26th Street, the Los Angeles River and Downey Street; 2) vehicular traffic along Indiana Street, East 26th Street, Downey Road and the 710 Freeway; and 3) industrial facilities in the area where the GNB facility is located, including slaughter houses, rendering plants, recycling and other industrial facilities.

The City of Vernon considers noise levels to be "normally compatible" if they are less than the Community Noise Equivalent Level (CNEL) of 80 decibels for industrial and some commercial land uses.

Ambient noise level readings were taken around the GNB facility at seven locations to determine the existing noise levels (See Figure 4). The ambient noise levels are as follows:

Location	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7
Decibels	72.5	73.0	72.0	74.5	75.0	74.0	73.0

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Noise generated as a result of this project would be produced primarily from the operation of heavy equipment including trucks, a crane and a backhoe tractor during excavation, demolition and construction activities. The estimated noise levels calculated to be generated during construction and excavation at the site are shown below:

Location	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7
Decibels	72.3	73.0	75.0	74.5	75.0	74.0	73.0

The calculated CNEL noise levels at the 7 locations surrounding the facility range from 72.3 to 75 decibels which complies with the City of Vernon noise ordinance which states that noise levels under 80 decibels are acceptable for industrial land uses

The project activities will be restricted to areas within the perimeter of the GNB facility where there

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would be a potential for on site worker impacts. However, any potential impacts to on-site workers associated with noise generated by this project will be reduced to a less-than-significant level with compliance with Occupational Safety and Health Administration (OSHA) regulations requiring workers exposed to occupational noise levels greater than 90 decibels to have adequate hearing protection. In addition, noise generated from this project would minimally affect the nearest residential areas located about 0.75 miles from the facility and would result in a less than significant impact from project activities.

Therefore, noise generated from activities related to this project will have a less than significant impact on the environment.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Findings:

Potentially Significant Impact <input type="checkbox"/>	Potentially Significant Unless Mitigated <input type="checkbox"/>	Less Than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Public Health and Safety (Workbook; page 34)

Description of Environmental Setting:

GNB is a manufacturer of lead-acid batteries, lead oxide and a smelter of secondary lead. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. Lead recycling and smelting activities have been conducted at the site since 1922. The GNB facility employees approximately 250 workers and will have between 60-80 truck deliveries to the facility during an average business day.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Analysis of Potential Impact:

As with most industrial facilities the potential for adverse health and safety impacts to workers and the public exist from daily operations. The proposed IS Permit Modification contains a Contingency Plan and Emergency Procedures that are designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of a hazardous waste.

This project involves the excavation of soils, demolition of concrete/pavement and building materials, and construction of a sumps, installation of tanks and building a corridor connecting to existing structures. Construction and excavation activities have the potential for generating fugitive dust and/or respirable particulate matter (PM_{10}) creating the potential for health and safety concerns. Demolition and construction activities will employ the best management practices for construction activities to reduce the possibility of fugitive dust and/or PM_{10} .

A worker Health and Safety Program for contractors and their employees doing work for GNB within the perimeter of the company is contained in the IS Permit Modification which is designed to minimize impacts to workers and the public which are associated with excavation, demolition and construction activities. Further, workers/employees involved with the demolition and construction activities must be trained in the handling of materials containing lead and lead oxide, thus reducing the potential for any adverse impacts associated with the generation of potentially contaminated lead fugitive dust.

In addition, ISD Modification will contain the following permit conditions: 1) all excavated soils shall be placed in lined containers on-site and, unless actively filling containers, containers must be covered at all times to prevent fugitive dust from leaving the facility site; 2) excavation and demolition areas shall be watered at least twice daily to prevent the generation of and prevent fugitive dust from leaving the site; 3) samples of excavated materials shall be tested and profiled to determine levels of

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contamination; 4) excavation and demolition activities may require work area containment to prevent the release of airborne materials; and 5) perimeter fence monitoring shall be established to track any release of airborne particulates and contaminants generated during demolition and excavation activities.

Associated with construction of the corridor project is the air pollution control system which has been approved by the SCAQMD. Installation of this system in conjunction with the corridor project will provide environmental benefits through reduction of fugitive emissions from the daily operation of the facility as required of the Consent Agreement between the Department and GNB.

Implementation of the Contingency Plan, Health and Safety Program, compliance with the Uniform Building Code, best construction practices, Cal-OSHA Title 8 regulations, and compliance with all conditions of SCAQMD permits and DTSC's ISD Modification will reduce any potential health and safety project activity impacts to a less-than-significant level.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Aesthetics (Workbook; page 38)

Description of Environmental Setting:

The existing GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (see Figure 1). The GNB facility is bounded to the north by East 26th Street and the Atchison, Topeka and Santa Fe railroad yard; to the south by Bandini Boulevard; to the east by Indiana Avenue; and to the west by Pioneer Aluminum. The facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone (see Figure 3) which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plants and junk/salvage yards.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

The Drop-Out Box System and the corridor projects will be implemented within the perimeter of the existing facility. The Drop-Out Box System is compatible with the existing visual makeup of the facility. The corridor project involves connecting two existing buildings with a similar corridor structure which consists of similar construction materials and building elevation. The project will not result in an aesthetically unpleasant site and will not add to light or glare impacts. Because project activities are located within the existing facility site, the project will not block any views or obstruct any scenic vista or view open to the public. Therefore, this project will have no impact on aesthetics.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cultural/ Paleontological Resources (Workbook; page 39)

Description of Environmental Setting:

Lead recycling and smelting activities have been conducted at the site since 1922. The original grading of the site occurred prior to 1922 to provide a flat ground for operations. Prior to 1922, the site was the location of a rendering plant boneyard. Since 1922 the facility has expanded for the next sixty years culminating in the reconstruction of the facility in 1982. It is, therefore, assumed that no unique geological resources (paleontological resources or unique outcrops) are present at the site or in the general Vernon area that could be disturbed by the continued operation of the facility or the construction of the proposed modifications.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Analysis of Potential Impacts:

Since this project is located in an area where soils have already been disturbed, and no unique geological resources (paleontological resources or unique outcrops) appear to be present at the site or in the general Vernon area, no impacts to cultural or paleontological resources is expected as a result of implementation of the project activities associated with the draft ISD Permit Modification.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, IS Modification Application, August 06, 1999.
EA, Inc., ADEIR, August, 1996.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cumulative Effects (Workbook; page 42)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon. Vernon has been developed as a city zoned for manufacturing, commercial, industrial, warehousing, slaughtering, and rendering uses. The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards. The GNB facility is compatible with this zoning designation.

The regional highway network surrounding the GNB facility is shown in Figure 1. Two major freeways provide access to the site: Interstate 5 to the north and Interstate 710 to the east. The area also is served by a number of railroads. The Atchison, Topeka and Santa Fe railroad right-of-way runs east-west, north of GNB on the north side of E. 26th Street. Traffic associated directly with GNB's daily business activities include transportation vehicles for about 250 workers and about 60-80 trucks on a daily basis.

Ref: RCRA Facility Assessment, DTSC, 1990.
GNB, ADEIR, EA, Inc., April, 1996.

Analysis of Potential Impacts:

As discussed in the Earth, Air, Risk of Upset, and Transportation/Circulation sections of this Initial Study project activities will result in a less-than-significant impact for these media categories. With all other media, the Initial Study has determined that no impacts will result with the implementation of project activities. Excavation, demolition, and construction activities associated with this project will be short-term, temporary and intermittent in nature occurring over the estimated 8-9 months for project completion. No other like or similar projects will occur during the completion of all project activities. As such, it has been determined that because of its short-term, temporary and intermittent/phased aspects, this project will result in less-than-significant cumulative impacts.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Population/Housing/Recreation (Workbook; page 43)

Description of Environmental Setting:

The GNB facility is located in the southern portion of Los Angeles County in the City of Vernon (see Figures 1 and 2). The GNB facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone which includes the Rendering Overlay District and allows for the operation of rendering plants, fertilizer plans and junk/salvage yards (see Figure 3). The GNB facility is compatible with this zoning designation.

Ref: RCRA Facility Assessment, DTSC, 1990.

Analysis of Potential Impacts:

Project activities involve excavation of soils; demolition of structures, concrete and pavement; and on-site construction of tank foundations and a corridor building at an existing IS lead recycling and smelting facility. This project will not result in or alter the location, distribution, density or growth rate of the human population; affect existing housing or create a demand for additional housing; or impact the quality or quantity of existing recreational opportunities; and, therefore, will have no impact on population, housing or recreation.

Ref: GNB, IS Modification Application, August 06, 1999.

Findings:

Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Mandatory Findings of Significance (Workbook; page 44)

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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V. DETERMINATION OF SIGNIFICANT EFFECT:

On the basis of this Initial Study:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment. A NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project COULD HAVE a significant effect on the environment, mitigation measures have been added to the project which would reduce these effects to less than significant levels. A NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project COULD HAVE a significant effect on the environment. An ENVIRONMENTAL IMPACT REPORT will be prepared.

Liang C. Chiang,

Hazardous Substances Engineer, P.E.

Name of Preparer

Title

Liang Chiang
Signature of Preparer

12/09/1999
Date

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ATTACHMENT A

**INITIAL STUDY
REFERENCE LIST**

GNB Technologies, Inc.
Approval of a CLASS 2 INTERIM STATUS MODIFICATION

1. GNB, Interim Status (IS) Modification Application, August 06, 1999.
2. RCRA Facility Assessment, DTSC, 1990.
3. Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game, May 1999.
4. GNB, Administrative Draft Environmental Impact Report, Environmental Associates, Inc., April, 1996.

INDIVIDUALS CONSULTED

Mr. Marco A. Polo
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South Coast Air Quality Management District

Nick Gleiter
Industrial Hygienist
State of California
Department of Industrial Relations
Division of Occupational Safety and Health

1 22, Division 4, hereafter "Title 22") with respect to
2 its hazardous waste operations at the Facility. A
3 listing of the violations alleged as a result of this
4 inspection accompanies this Consent Agreement and Order
5 ("Agreement and Order") as Exhibit "A."

6 2. On July 7, August 23, September 1, September 14 and
7 October 17, 1989, the Department conducted further
8 inspections of the Facility. As a result of these
9 inspections, the Department issued a Report of
10 Violation, dated May 9, 1990, alleging that Respondent
11 violated certain provisions of the HWCL and Title 22.
12 A true and correct copy of this May 9, 1990 Report of
13 Violation accompanies this Agreement and Order as
14 Exhibit "B".

15 3. On September 13, September 19 and December 6, 1990, the
16 Department conducted follow up inspections of the
17 Facility. As a result of these inspections, the
18 Department has alleged the violations of the HWCL and
19 Title 22 set forth in Exhibit "C".

20 4. On February 11, 1992, the Department conducted an
21 inspection of the Facility. As a result of this
22 inspection, the Department issued a Report of Violation
23 dated April 2, 1992, alleging that Respondent violated
24 certain provisions of the HWCL and Title 22. A true
25 and correct copy of this April 2, 1992 Report of
26 Violation accompanies this Agreement and Order as
27 Exhibit "D".

1 5. On October 27 and 28, 1992, the Department conducted an
2 inspection of the Facility. As a result of this
3 inspection, the Department issued a Report of Violation
4 dated January 12, 1993, alleging that Respondent
5 violated certain provisions of the HWCL and Title 22.
6 A true and correct copy of this January 12, 1993 Report
7 of Violation accompanies this Agreement and Order as
8 Exhibit "E".

9 6. On February 21 and March 20, 1990, Department
10 inspectors conducted inspections of trucks carrying
11 materials from the GNB Facility. As a result of these
12 inspections, the Department has alleged that Respondent
13 violated certain provisions of the HWCL and Title 22,
14 as set forth in Exhibit "F".

15 The results of these inspections were referred for
16 enforcement to the California Attorney General's Office and, on
17 April 17, 1992, that office sent Respondent a letter which
18 summarized the alleged violations which were then outstanding. A
19 true and correct copy of this April 17, 1992 letter accompanies
20 this Agreement and Order as Exhibit "G".

21 The Department hereby alleges that Respondent has
22 violated the HWCL and Title 22 in the manner described in the
23 attached Exhibits "A" through "H".

24 The Department and Respondent now settle and resolve
25 the allegations made in Exhibits "A" through "H" on the terms set
26 forth in this Agreement and Order. The Effective Date of this
27 Agreement and Order shall be the date upon which this Agreement
28 and Order is executed by the Department.

1 2. Waiver of Hearing

2 Respondent waives its right to a hearing on the
3 allegations set forth in Exhibits "A" through "H".

4 3. Settlement of Disputed Claims

5 The parties enter into this Agreement and Order
6 pursuant to a compromise and settlement of disputed claims for
7 the purpose of avoiding prolonged and complicated litigation and
8 furthering the public interest. Respondent does not admit any
9 allegations made in Exhibits "A" through "H", except that
10 Respondent agrees as follows: Solely for the purposes of
11 application of the Department's civil penalty policy in any
12 action which the Department brings under the HWCL as a result of
13 future conduct of Respondent, Respondent agrees not to contest
14 the facts set forth after the words "to wit" in paragraphs 1-6 of
15 Exhibit H, hereto; Respondent's agreement not to contest such
16 facts will be limited to actions which the Department brings
17 before June 30, 1995 and will not apply to actions which the
18 Department brings after that date.

19 Nothing in this section shall be construed to (1)
20 prevent Respondents from offering, at the hearing of any
21 subsequent enforcement action, evidence whose purpose is to
22 mitigate, or to challenge the relevance of, any alleged
23 violation, including the violations listed in Exhibit "H", or
24 (2) to waive the Department's rights to offer, at any judicial or
25 administrative proceeding, evidence of any violations of law or
26 regulation allegedly committed by Respondent.

27 4. Basic Settlement Terms

28 Respondent agrees to do the following:

1 4.1 Civil Penalties (\$162,500)

2 Respondent shall pay civil penalties to the Department
3 in the amount of One Hundred Sixty-Two Thousand Five Hundred
4 Dollars (\$162,500). This amount shall be paid in three
5 installments, as follows: (1) Fifty-Four Thousand Dollars
6 (\$54,000) shall be paid to the Department within 20 days of
7 the Effective Date of this Agreement and Order; (2) Fifty-
8 Four Thousand Dollars (\$54,000) shall be paid on or before
9 January 10, 1994; and (3) Fifty-Four Thousand Five Hundred
10 Dollars (\$54,500) shall be paid on or before January 10,
11 1995.

12 Payment shall be mailed to:

13 Department of Toxic Substances Control
14 Accounting Unit
15 P.O. Box 806
16 Sacramento, California 94812-0806

17 Copies of the checks shall be mailed to:

- 18 1. Dennis A. Ragen
19 Deputy Attorney General
20 P.O. Box 85266
21 110 West A Street, Suite 700
22 San Diego, California 92186-5266
- 23 2. Chief, Facility Management Branch -- Region III
24 Department of Toxic Substances Control
25 1011 N. Grandview Ave.
26 Glendale, California 91201

27 4.2 Corrective Environmental Commitments

28 Respondent shall undertake the Corrective Environmental
Commitment described in Section 5 of this Agreement and
Order.

 4.3 Corrective Action.

Respondent shall perform all the Corrective Action set
forth in Section 6 below.

1 5. Corrective Environmental Commitments

2 In addition to the payments to the Department and to
3 the Corrective Action referred to in paragraphs 4.1 and 4.3
4 above, Respondent shall undertake the following Corrective
5 Environmental Commitment:

6 5.1. Electrowinning Pilot Project.

7 5.1.2. No later than July 1, 1996, Respondent shall
8 spend no less than Four Hundred Seventy-Five Thousand
9 Dollars (\$475,000) of its own funds for the research,
10 development, installation and/or activation of an
11 Electrowinning Pilot Project at its Vernon Facility. A
12 description of this project is attached hereto as Exhibit
13 "I". In determining whether Respondent has made this
14 \$475,000 expenditure, Respondent and the Department agree
15 that:

- 16 (i) the costs to be allowed include only those costs that
17 Respondent must incur to purchase equipment, or to
18 employ consultants, engineers or other personnel, to
19 research, develop or install the project, who are not
20 otherwise salaried or payroll employees of Respondent;
21 Respondent shall not receive credit for payments for
22 salaries or other expenditures for persons who are
23 regular employees of Respondent, and
24 (ii) the costs to be allowed include only those costs which
25 Respondent pays out of its own funds and which are not,
26 and will not be, reimbursed by grants, credits or other
27 payments from governmental agencies, industry groups or
28 other similar sources.

1 5.1.3. No later than August 1, 1996, Respondent shall
2 submit documentation to the Department of the costs incurred
3 for its corrective environmental commitment activities
4 described in Paragraph 5.1 - 5.1.2. If the total costs
5 expended by Respondent as of that date are less than
6 \$475,000, Respondent shall pay to the Department, in a lump
7 sum tendered by August 15, 1996, the difference between one-
8 half of the amount actually expended by Respondent and
9 \$237,500. As an example, if, as of July 1, 1996, Respondent
10 has expended only \$300,000 on the Electrowinning Pilot
11 Project, it must pay \$87,500 to the Department, which is the
12 difference between \$237,500 and one-half of \$300,000
13 (\$150,000). Any such payments shall be regarded as civil
14 penalties arising from Respondent's failure to comply with
15 the terms of this Agreement and Order, and shall be in
16 addition to the amounts paid in accordance with Paragraph
17 4.1 of this Agreement and Order.

18 5.1.5. If Respondent conducts none of the activities
19 required under this paragraph within the relevant time
20 frames, Respondent hereby agrees that on or before August
21 15, 1996, it will to pay the Department a lump sum of
22 \$237,500 as penalties arising from Respondent's failure to
23 comply with the terms of this Agreement and Order. This
24 \$237,500 amount shall be in addition to any amounts paid in
25 accordance with Paragraph 4.1 of this Agreement and Order.

26 6. Schedule for Compliance

27 Respondent shall complete corrective action as
28 follows:

1 6.1. Immediate Corrective Action. Unless the
2 following items of corrective action have already been completed,
3 Respondent agrees that immediately on signing this Agreement and
4 Order it will, as required by the laws of the State of
5 California, comply with the following:

6 6.1.1. Respondent will not maintain hazardous waste
7 piles unless they are in compliance with Title 22, §§
8 66265.250 through 66265.258.

9 6.1.2. Respondent will handle the following materials
10 in accordance with California law: (1) battery separator
11 case waste, (2) crushed or used drums and (3) crucibles;
12 Respondent will not maintain these materials in unpermitted
13 hazardous waste piles.

14 6.1.3. When Respondent ships any products, materials,
15 wastes or recyclable materials off its premises, Respondent
16 will ensure that the outgoing trucks or containers do not
17 leak hazardous wastes onto the streets or highways.

18 6.1.4. Prior to shipping its polypropylene chips off
19 its premises, Respondent will dry them sufficiently to
20 ensure that leachate from these chips does not leak onto the
21 streets or highways.

22 6.1.5. Respondent will ship its polypropylene chips
23 under hazardous waste manifest, using a registered
24 transporter, to a Facility which has a Permit or other
25 authorization from the Department allowing it to accept
26 hazardous waste.

27 6.1.6. Respondent will post and maintain signs with
28 the warnings required by Title 22, § 66265.14(c) at the

1 entrance to the active portion of the Facility.

2 6.1.7. Respondent will make emergency arrangements
3 with emergency response agencies, including local police and
4 fire departments and local hospitals, as required by Title
5 22, § 66265.37.

6 6.1.8. Respondent will develop and follow a waste
7 analysis plan which identifies the components of its waste
8 streams, as required by Title 22, § 66265.13(b).

9 6.1.9. Respondent will maintain an adequate inspection
10 schedule and inspection log, including during periods when
11 its environmental clerk is on vacation, as required by Title
12 22 § 66265.15(d).

13 6.1.10. Respondent will maintain a Contingency Plan
14 which complies with the provisions of Title 22, §§ 66265.51
15 and 66265.52, and contains, without limitation, (1) a
16 specific description of actions to be taken by company
17 personnel in an emergency, (2) a description of arrangements
18 with emergency response agencies, (3) a listing of all
19 emergency equipment, with a description of the location and
20 capability of each item, (4) a legible evacuation plan which
21 describes the signals to be used to begin evacuation, and
22 (5) the name of the primary and all alternate emergency
23 coordinators.

24 6.1.11. Respondent will maintain a closure plan which
25 complies with the provisions of Title 22, § 66265.112 and,
26 without limitation, details the equipment and methods for
27 testing contaminated soil.

28 \ \ \

1 6.1.12. Respondent will maintain a closure cost
2 estimate, as required by Title 22, § 66265.142.

3 6.1.13. Respondent will maintain a training program
4 which complies with Title 22, § 66265.16.

5 6.1.14. Respondent will maintain accumulation dates on
6 pallets of batteries, as required by Title 22, § 66266.81
7 (a)(7)(D).

8 6.1.15. Respondent will file a Notice of Discrepancy
9 in the event that it receives waste from a foreign generator
10 under a manifest that is incomplete, as required by Title
11 22, § 66265.72.

12 6.1.16. Respondent will maintain an operating record,
13 which, without limitation, cross-references the storage
14 location of hazardous waste received under manifest with the
15 appropriate manifest document numbers, as required by Title
16 22, § 66265.73 (b)(2).

17 6.1.17. Respondent will maintain training records
18 which satisfy the provisions of Title 22, §§ 66265.16 (d)
19 and (e) and include, without limitation, a showing that
20 employees handling hazardous wastes (including, without
21 limitation, slags, drosses and polypropylene chips) have
22 received training within six months of beginning employment.

23 6.1.18. Respondent will refrain from charging the
24 reverberatory furnace with rubber chips in excess of those
25 needed as a reducing agent.

26 6.1.19. Respondent has cleaned its Engineering and
27 Laboratory Building and, as required by Title 22 §
28 \ \ \

1 66265.173, will ensure that it does not contain open,
2 unlabelled containers of hazardous wastes.

3 6.1.20. Respondent has cleaned its Sampling Lab and
4 will keep the floor of this area free of lead granules.

5 6.1.21. Respondent will manage broken and leaking
6 batteries as hazardous waste and shall, without limitation,
7 store damaged batteries inside closed containers, as
8 required by Title 22, § 66266.81(b)(1).

9 6.1.22. Respondent will take precautions necessary to
10 ensure that it does not accept metallic sodium waste.

11 6.1.23. Respondent will (i) properly handle its
12 wastewater treatment filter media as a hazardous waste and
13 (ii) will place this material inside closed containers from
14 which there will be no leaks onto the ground or the Facility
15 substrate, as required by Title 22, § 66265.31.

16 6.1.24. Respondent will maintain containers of
17 hazardous waste, including, without limitation, lead dross
18 and batteries, properly labelled, free from leaks and
19 securely closed, except when necessary to add or remove
20 material from such containers, as required by Title 22 §§
21 66265.171 and 66266.81(b)(1).

22 6.1.25. Respondent will store hazardous waste
23 including, without limitation, waste batteries and waste
24 bundles received from KW Plastics, only in areas which are
25 authorized under its Interim Status Document or Permit.

26 6.1.26. Respondent will conduct regular inspections of
27 the rainwater retention pond located at the south end of its
28 Facility.

1 6.1.27. Respondent will submit a written report to the
2 Department within 15 days after any fire or other emergency
3 requiring the implementation of the Contingency Plan, as
4 required by Title 22, §66265.56.

5 6.1.28. Respondent will maintain Land Disposal
6 Restriction notifications for wastes received, as required
7 by Title 22, §66265.73(b)(9).

8 6.1.29. Respondent will maintain copies of Land
9 Disposal Restrictions for hazardous wastes shipped offsite,
10 as required by Title 22, §66268.7.

11 6.1.30. Respondent will maintain aisle space, as
12 required by Title 22, Section 66265.35, including, without
13 limitation, in the battery storage yard.

14 6.1.31. Respondent will maintain containers of
15 recyclable materials labeled with the words "Excluded
16 Recyclable Material" and any other language required by HSC
17 sections 25143.2 and 25143.9.

18 6.1.32. Verification Submittal. Within 30 days of the
19 Effective Date of this Stipulation and Order, Respondent
20 will provide the Department with a submittal, certifying
21 when and how it completed each item of corrective action
22 described in paragraphs 6.1.1 through 6.1.31, above.

23 6.2. Other Corrective Action. Respondent shall
24 complete the following item of corrective action within the time
25 limits set forth below:

26 6.2.1. Within 30 days of the Effective Date of this
27 Agreement and Order, Respondent will submit to the
28 Department a plan which describes how Respondent will handle

1 the materials which it plans to feed to its reverberatory
2 furnace (Furnace Materials) in accordance with any
3 applicable provisions of RCRA, the HWCL and Title 22;
4 without limiting the foregoing, this submittal will show
5 that the Furnace Materials are stored in way which minimizes
6 the threat of releases of hazardous wastes into the
7 environment. The Department will review this plan and
8 inform Respondent of any deficiencies.

9 7. Matters Covered by This Agreement and Order

10 This Agreement and Order fully and finally settles all
11 of the Department's claims for penalties arising out of the
12 inspections of the Facility, as alleged in Exhibits A through H,
13 hereto. The provisions of this paragraph are expressly
14 conditioned upon full and complete performance by Respondent of
15 all of the terms and conditions of this Agreement and Order.
16 Nothing in this Agreement and Order is intended to release
17 Respondent from liability, if any, for any clean-up measures or
18 costs, response or oversight costs, or damages for injuries to
19 persons or property. Any issues concerning possible
20 contamination at or around the facility are explicitly not
21 covered by this Agreement and Order, and the Department reserves
22 its rights to seek characterization and clean-up of any such
23 contamination. Except as expressly provided in this Agreement
24 and Order, nothing in this Agreement and Order is intended or
25 shall be construed to preclude the Department or any state
26 agency, department, board or entity from exercising its authority
27 under any law, statute or regulation.

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1 8. Requirements of the Department

2 The duties imposed on Respondent by this Agreement and
3 Order shall be construed to be requirements of the Department
4 issued pursuant to HSC Division 20, Chapter 6.5. Any violation
5 of this Agreement and Order is separate and in addition to any
6 violation of any provision of HSC Division 20, Chapter 6.5.

7 9. Facility Access

8 Respondent shall provide access to the Facility at all
9 reasonable times to employees, contractors and consultants of the
10 Department. Nothing in this Agreement and Order is intended to
11 limit in any way the right of entry or inspection that any agency
12 may otherwise have by operation of law. The Department and its
13 authorized representatives shall have the authority to enter and
14 move freely about all property at the Facility at all reasonable
15 times for purposes of inspecting records and documents, reviewing
16 the progress of Respondent in carrying out the terms of this
17 Agreement and Order, and conducting such tests as the Department
18 may deem necessary.

19 10. Sampling, Data, and Document Availability

20 Respondent shall permit the Department and its
21 authorized representatives to inspect and copy all sampling,
22 testing, monitoring, and other data generated by Respondent or on
23 its behalf in any way pertaining to work undertaken pursuant to
24 this Agreement and Order. Respondent shall allow the Department
25 and its authorized representatives to take duplicates of any
26 samples collected by Respondent pursuant to this Agreement and
27 Order. Respondent shall maintain a central depository of the
28 data, reports, and other documents prepared pursuant to this

1 Agreement and Order. All such data, reports, and other documents
2 shall be preserved by Respondent for a minimum of five years
3 after the conclusion of all activities under this Agreement and
4 Order. If the Department requests that some or all of these
5 documents be preserved for a longer period of time, Respondent
6 shall either comply with that request, deliver the documents to
7 the Department, or permit the Department to copy the documents
8 prior to destruction. Respondent shall notify the Department in
9 writing at least six months prior to destroying any documents
10 prepared pursuant to this Agreement and Order.

11 11. Notice

12 All submissions and notices required by this Agreement
13 and Order shall be sent to:

14 Department: Chief, Facility Management Branch -- Region III
15 Department of Toxic Substances Control
16 1011 N. Grandview Avenue
17 Glendale, California 91201

18 and to:

19 Dennis A. Ragen
20 Deputy Attorney General
21 110 West A Street, Suite 700
22 P.O. Box 85266
23 San Diego, California 92186-5266

24 Respondent:

25 Mr. William McKusky
26 GNB Incorporated
27 2700 S. Indiana Street
28 P.O. Box 23957
Los Angeles, California 90023-0957

29 All approvals and decisions of the Department regarding
30 any matter requiring approval or decision under the terms of this
31 Agreement and Order shall be communicated in writing to
32 Respondent. No informal advice, guidance, suggestions or
33 comments by employees or officials of the Department regarding

1 submissions or notices shall be construed to relieve Respondent
2 of its obligation to obtain the final written approvals required
3 by this Agreement and Order.

4 12. Department Not Liable

5 The Department and the State of California shall not be
6 liable for any injury or damage to persons or property resulting
7 from acts or omissions by Respondent, its directors, officers,
8 employees, agents, representatives or contractors in carrying out
9 activities pursuant to this Agreement and Order. The Department
10 shall not be held as a party to or guarantor of any contract
11 entered into by Respondent, its directors, officers, employees,
12 agents, representatives or contractors in carrying out activities
13 required pursuant to this Agreement and Order.

14 13. Modification of Agreement and Order

15 This Agreement and Order may be modified only upon
16 written approval of the parties hereto.

17 14. Extensions

18 Respondent may request in writing an extension of the
19 compliance schedule provided herein prior to the date compliance
20 is due. If the Department determines that good cause exists for
21 an extension, it will grant the request and specify in writing a
22 new compliance schedule. Where feasible, the Department shall
23 respond, in writing, within thirty (30) days of receipt of any
24 request for an extension of the compliance schedule. Silence
25 does not constitute approval of the extension and Respondent is
26 not authorized to violate the compliance schedule herein unless
27 and until the Department agrees in writing.

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1 15. Penalties for Noncompliance

2 Failure to comply with the terms of this Agreement and
3 Order may also subject Respondent to penalties or liability for
4 any costs incurred by the Department or other government agencies
5 as a result of such failure, as provided by HSC Section 25188 and
6 other applicable provisions of law.

7 In addition, should Respondent fail to comply with the
8 terms of this Agreement and Order, Respondent and the Department
9 agree that this Agreement and Order may, upon application of the
10 Department, be reduced to judgment by the Superior Court of the
11 State of California.

12 16. Application and Effective Date

13 This Agreement and Order shall apply to and be binding
14 upon the Department and Respondent, their directors, officers,
15 employees and agents and the successors or assigns of either of
16 them. This Agreement and Order shall become effective when
17 signed the Director of the Department or his designee.

18 17. Construction and Jurisdiction

19 This Agreement and Order shall be construed in
20 accordance with the laws of the State of California. Respondent
21 agrees to submit to the jurisdiction of the Superior Court of the
22 State of California for purposes of the enforcement of any of the
23 provisions of this Agreement and Order.

24 18. Authority to Enter Agreement and Order

25 Each signatory to this Agreement and Order certifies
26 that he or she is fully authorized by the party he or she
27 represents to enter into this Agreement and Order, to execute it

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1 on behalf of the party represented and legally to bind that
2 party.

3 19. Integration

4 This Agreement and Order constitutes the entire
5 agreement between the parties and may not be amended or
6 supplemented except in writing and as provided for herein.

7 IT IS SO STIPULATED:

8 DANIEL E. LUNGREN, Attorney General
9 of the State of California
10 RODERICK E. WALSTON,
11 Chief Assistant Attorney General
12 THEODORA BERGER,
13 Assistant Attorney General
14 DENNIS A. RAGEN
15 PEARL LATTAKER
16 Deputy Attorneys General

13 Dated: July 6, 1993

13 By: Dennis A. Ragen
14 DENNIS A. RAGEN
15 Attorneys for Department of
16 Toxic Substances Control

17 GNB, INCORPORATED

18 Dated: July 7, 1993

18 By: E. L. Puckett
19 Its General Manager

20 SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

21 Dated: July 8, 1993

21 By: Thomas Dent
22 THOMAS DENT
23 Attorney for Respondent
24

25 IT IS SO ORDERED:

26 DEPARTMENT OF TOXIC SUBSTANCES CONTROL

27 Dated: July 19, 1993

27 By: William F. Soo Hoo
28 WILLIAM F. SOO HOO, Director

EXHIBIT A

1. On or around May 5, 1987, Respondent violated Title 22 of the California Administrative Code (Title 22), § 67102(b) in that it did not have a waste analysis plan for hazardous waste received.
2. On or around May 5, 1987, Respondent violated Title 22, § 67102 (b) in that it had no "Hazardous Waste Area" signs posted at the entrances to the active portion of the facility.
3. On or around May 5, 1987, Respondent violated Title 22, § 67104 in that it did not have a written inspection schedule or inspection log.
4. On or around May 5, 1987, Respondent violated Title 22, § 67105, in that it did not have a training program for personnel.
5. On or around May 5, 1987, Respondent violated Title 22, § 67126, in that it had not made required arrangement with emergency response agencies.
6. On or around May 5, 1987, Respondent violated Title 22, § 67141, by maintaining an inadequate contingency plan; specifically: (1) descriptions of actions to be taken by facility personnel were too general to be useful, (2) there was no description of arrangements agreed to by emergency response agencies, (3) the plan did not list all emergency equipment, the location of each item, and a description of its capability, and (4) the evacuation plan was not legible, and there was no description of signals to begin evacuation.
7. On or around May 5, 1987, Respondent violated Title 22, § 67212, in that it did not have a written closure plan.
8. On or around May 5, 1987, Respondent violated Title 22, § 67002, in that it did not have a closure cost estimate.
9. On or around May 5, 1987, Respondent violated Title 22, § 66389(b)(1) in that it maintained a hazardous waste pile, which was not allowed under the facility's Interim Status Document.
10. On or around May 5, 1987, Respondent violated Title 22, § 67341 in that the waste pile at the facility (did not have an impermeable liner to prevent migration of waste into subsurface soil or ground water and (2) there was no leachate collection and removal system.
11. On or around May 5, 1987, Respondent violated Title 22, § 66508(a) (1-2), in that there were no accumulation dates on pallets of batteries in the lot at the facility.

DEPARTMENT OF HEALTH SERVICES
SUBSTANCES CONTROL PROGRAM (REGION 3)
N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 867-3000



May 9, 1990

Mr. Ken Clark
Technical and Environmental Manager
Western Region
GNB Incorporated
2700 South Indiana Avenue
Los Angeles, CA 90023-0957

Dear Mr. Clark:

REPORT OF VIOLATIONS

On July 7, August 23, September 1, September 14, and October 17, 1989, the Department of Health Services (DHS) conducted an inspection of GNB Incorporated, located at 2700 South Indiana Avenue, Los Angeles, California 90023-0957 (CAD097854541).

As a result of that inspection, violations of hazardous waste statutes and regulations were identified.

Specific violations are listed below. Failure to correct the identified violations will result in DHS citing you for continuing/additional violations.

I. SCHEDULE OF VIOLATIONS:

COUNT 1: Division 20, Health and Safety Code, section 25189 (c).

GNB Incorporated intentionally disposes of hazardous waste at an unpermitted facility in Bakersfield, California.

COUNT 2: Title 22, California Code of Regulations (Cal. Code Regs.), section 66371. Permit to Have a Wastepile.

GNB Incorporated's Interim Status Document does not allow it to maintain a wastepile. GNB Incorporated maintains several unregulated wastepiles.

COUNT 3: Division 20, Health and Safety Code, section 25160(b) and Title 22, Cal. Code Regs., section 66480 (a) and (b). General Requirements for Manifest Use by the Generator.

GNB has submitted hazardous waste for transportation to KU Plastics in Bakersfield, California without using an appropriate manifest.

COUNT 4: Title 22, Cal. Code Regs., section 67120 (a). Design and Operation of Facility.

GNB Incorporated has not designed, constructed, maintained or operated its facility so as to minimize the possibility of any

Mr. Ken Clark

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unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water which could threaten human health or the environment.

COUNT 5: Division 20, Health and Safety Code, section 25191 (c) (1).

CNB authorized the transport and/or transports hazardous waste (polypropylene scrap) in a truck, and trailer which does not contain a current certificate of compliance. ✓

COUNT 6: Division 20, Health and Safety Code, section 25191 (c) (2).

CNB handles, carries and authorizes the carrying and handling of hazardous waste without having a proper manifest in the driver's possession. ✓

COUNT 7: Title 22, Cal. Code Regs., section 67166. Unmanifested Waste Report.

CNB Incorporated accepted unmanifested hazardous waste for treatment and storage from Eagle-Picher Industries without filing the required report with the Department within fifteen days of receiving the waste. ✓

COUNT 8: Title 22, Cal. Code Regs., section 67243 (a). Management of Containers.

CNB had numerous open containers holding hazardous waste. ?

COUNT 9: Title 22, Cal. Code Regs., section 67243 (b). Management of Containers.

CNB had at least one leaking container of hazardous waste. ?

COUNT 10: Title 22, Cal. Code Regs., section 67124. Required Aisle Space.

CNB has not maintained adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in their drum storage area. ?

COUNT 11: Title 22, Cal. Code Regs., section 66515 (d) (1). International Shipments.

CNB has received hazardous waste from a foreign generator and failed to include the address of the foreign generator on the manifest. ?

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COUNT 12: Title 22, Cal. Code Regs., section 66541 (d). Manifest Procedures for the Transporter.

GNB imported hazardous waste from Mexico without having the Generator of Waste and Transporter of Waste sections completed on the manifest.

COUNT 13: Title 22, Cal. Code Regs., section 67314 (a) (2). Inspections for Interim Status Facilities.

GNB has not inspected the surface impoundment at least once a week to detect leaks, deterioration, or failures in the impoundment.

The issuance of this Report of Violations does not preclude DHS from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Dave Rasmussen at (818) 567-3057.

Sincerely,



Scott Simpson, Chief
Facility Management Unit

Certified Mail
P 757 544 049
R R R

cc: Mr. William Soo Hoo
Assistant Chief Counsel
Toxics Legal Office
Toxic Substances Control Program
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Ms. Mary Locke, Chief
Office of Local Enforcement
Toxic Substances Control Program
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Ken Clark

Page 4

May 9, 1990

cc: Ms. Lucille van Ommering
Financial Responsibility Unit
Toxic Substances Control Program
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Larry Matz
Surveillance and Enforcement Section
Toxic Substances Control Program
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Gary Lance
Waste Compliance Branch
U.S. Environmental Protection Agency
Region IX
1235 Mission Street
San Francisco, CA 94103

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 South Grand Ave., Room 607
Los Angeles, CA 90007

EXHIBIT C

- 1, GNB, Incorporated (GNB) continued to ship polypropylene scrap hazardous waste to an unpermitted facility, using an unregistered hazardous waste hauler.
2. GNB added hard rubber chips to the reverberatory furnace without making a determination of how much was appropriate.
3. GNB maintained the engineering and laboratory building in disarray with open buckets of chemicals.
4. GNB maintained the sampling laboratory floor is a disorderly condition with possible areas of lead contamination.
5. GNB received incoming battery feedstock in cracked or damaged condition.
6. GNB stored broken or leaking batteries outside the permitted area.
7. GNB maintained drums of tin dross which were susceptible to leaks due to damage to the containers.
8. GNB maintained drums of tin dross open and subject to dispersal by the elements.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504

(818) 567-3000



April 2, 1992

CERTIFIED MAIL

Mr. Kenneth G. Clark
Technical and Environmental Manager
GNB, Inc.
2700 South Indiana Avenue
Los Angeles, California 90023-0957

Dear Mr. Clark:

REPORT OF VIOLATION AND SCHEDULE OF COMPLIANCE

On February 11, 1992, Wendell Francisco and Nancy Steele, representing the California Environmental Protection Agency, Department of Toxic Substances Control (the Department), conducted a focused inspection of GNB, Inc., 2700 South Indiana Avenue, Los Angeles, California (CAD097584541).

As a result of this inspection, violations of hazardous waste statutes and regulations were identified. The specific violations and required corrective action are listed below. Failure to correct the identified violations within the schedule provided will result in DTSC citing you for continuing/additional violations.

I. VIOLATIONS

COUNT 1: Title 22, California Code of Regulations (Cal. Code Regs.), section 66270272(a)(1). Changes During Interim Status.

On or about February 11, 1992, GNB stored one pallet of battery cells outside the battery storage area, next to the truck weigh scales.

COUNT 2: Title 22, California Code of Regulations (Cal. Code Regs.), section 66265.31. Maintenance and Operations of Facility.

On or about February 11, 1992, GNB failed to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment in that GNB placed hazardous wastewater treatment filter media on the facility substrate near the wastewater treatment plant and left it uncovered or contained.

II. SCHEDULE FOR CORRECTION

1. Correct violations upon receipt of this Report.

Mr. Kenneth G. Clark

April 2, 1992
Page 2

Please submit written certification, which contains the language in Title 22, California Code of Regulations, section 66270.11(d) to this office within 30 days of receipt of this Report that the violations have been corrected. The Department may conduct a reinspection of GNB to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil, or criminal actions as a result of the violation noted herein.

If you have any questions regarding this Report, please contact Nancy Steele of our office at (818) 567-3020.

Sincerely,



Paul M. Baranich
Senior Hazardous Materials Specialist

Certified Mail
P 573 965 395
(Return Receipt Requested)

cc: Mr. James R. Outright
Acting Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Don Johnson, Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Maria Kelly
Waste Compliance Branch (H-4-1)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Kenneth G. Clark

April 2, 1992

Page 3

cc: Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, California 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



January 12, 1993

CERTIFIED MAIL

Mr. William McKusky, Environmental Manager
GNB Incorporated, Resource Recycling Division
2700 South Indiana Street
P.O. Box 23957
Vernon, California 90023-0957

Dear Mr. McKusky:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On October 27 & 28, 1992, representatives of the Department of Toxic Substances Control (DTSC) conducted inspections of GNB Incorporated, Resource Recycling Division located at 2700 South Indiana Street, Vernon, 90023 (CAD097854541).

As a result of these inspections, violations of hazardous waste statutes and regulations were identified.

Specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in DTSC citing you for continuing/additional violations.

I. Schedule of Violations

COUNT 1: California Code of Regulations (Cal. Code Regs.), Title 22, Section 66265.173 (a).

GNB stored two hazardous waste containers that were not closed in the reverberatory furnace building. These containers were covered but the lids were not secured. At the time of the inspection, waste was not being added to or removed from these containers.

COUNT 2: Health and Safety Code, Chapter 6.5, Section 25189 (d).

GNB stores hazardous waste at a point which is not authorized (e.g. lead acid batteries stored in the west yard, unlabelled containers, and waste bundles received from KW Plastic).

COUNT 3: Cal. Code Regs., Title 22, Sections 66265.15 (a) and 66265.226 (a) and Interim Status Document (ISD) Part III. 5. (a).

Inspections are not conducted for GNB's rainwater retention pond located at the south end of the facility.

Mr. William McKusky
GNB, Inc.
Page 2

COUNT 4: Cal. Code Regs., Title 22, Sections 66265.56 (j) and ISD Part III 17. (j).

A written report was not submitted to the Department within 15 days (according to the regulations) nor 30 days (according to the ISD) after a fire occurred in GNB's blast furnace feed storage room.

COUNT 5: Cal. Code Regs., Title 22, Section 66265.73 (b) (13).

Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 90787820, 90787819, 92124889, 88316378, 88316367, 91782572, 91657969, and 90149556 under which EPA Waste Number D008 was received by GNB.

COUNT 6: Cal. Code Regs., Title 22, Section 66268.7 (a) (b).

Copies of Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 91529490, 90982474, 91529515, and 91529512 under which EPA Waste Number D008 was shipped offsite.

COUNT 7: Cal. Code Regs., Title 22, Section 66265.15 (d) and ISD Part III. 5. (d).

Inspection logs were not maintained between 2/8/92 and 2/23/92. The Environmental Clerk was on vacation and the inspection logs were not completed in his absence.

COUNT 8: Cal. Code Regs., Title 22, Section 66266.81 (b) (1).

GNB did not store damaged batteries inside closed containers.

COUNT 9: Cal. Code Regs., Title 22, Section 66265.35.

GNB did not maintain aisle space at the battery storage areas nor for the batteries stored in the west yard.

COUNT 10: Cal. Code Regs., Title 22, Section 66265.73 (b) (2) and ISD Part IV. 1. (b) (2).

GNB did not cross-reference, in the operating record, the storage location of hazardous waste received under manifest with the appropriate manifest document numbers.

Mr. William McKusky
GNB, Inc.
Page 3

COUNT 11: Health and Safety Code, Chapter 6.5, Section 25143.9 (a).

Containers stored in the battery storage area were not marked with the words "Excluded Recyclable Material". These containers were identified on a bill of lading as having been generated at GNB's facility in Frisco, Texas.

II. Schedule for Correction

Correct all violations upon receipt of this Report.

Please submit written verification to this office by February 8, 1993, that the above violation(s) have been corrected.

All submittals to the Department, as requested above, must contain the signed certification as required by Section 66270.11, Title 22, California Code of Regulations.

The Department will conduct a reinspection of GNB to verify compliance.

The issuance of this Report Of Violation and Schedule of Compliance does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Jerry Lile at (818) 567-3052.

Sincerely,

Maune Pichey, for

Scott Simpson
Branch Chief
Facilities Management Branch

CERTIFIED MAIL
P 390 273 593
(Return Receipt Requested)

Mr. William McKusky
GNB, Inc.
Page 4

cc: Mr. James R. Outright
Acting Chief Counsel
Office of Legal Counsel
California Environmental Protection Agency
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P.O. Box 806
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Ms. Mary Locke, Chief
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Mr. Larry Matz, Acting Chief
HQ's Surveillance and Enforcement
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Mr. Joe Karbus
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Commerce, California 90040

Mr. Robert Ghirelli
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Los Angeles Region
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Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

Mr. William McKusky
GNB, Inc.
Page 5

cc: Mr. Norman Michiels, Director
Environmental Health Department
City of Vernon
4305 Santa Fe Avenue
Vernon, California 90058

EXHIBIT F

GNB negligently or intentionally released hazardous wastes into the environment on the following occasions:

1. On February 21, 1990, a Wiley Saunders truck carrying GNB scrap polypropylene chips was stopped at a California Highway Patrol truckstop. A sample taken from the leachate falling from the truck onto the highway showed that this leachate was contaminated with hazardous waste levels of lead.
2. On March 14, 1990, samples were taken from a disabled Wiley Saunders truck carrying polypropylene chips from GNB. Samples showed that the liquid leaking from the truck onto the highway contained hazardous waste levels of lead.
3. On September 1, 1989, the Department sampled liquid falling from a truck onto the tarmac at GNB's loading dock. The truck contained polypropylene chips. The samples showed that the liquid contained hazardous waste levels of lead.
4. From September 1, 1989 until sometime after March 14, 1990, GNB failed to test the lead content of the liquid leaking from its polypropylene waste prior to sending the waste off its premises. GNB thereby violated Title 22, § 67120, by failing to minimize the threat of the release of hazardous waste to the air and soil.

DANIEL E. LUNGREN
Attorney General

State of California
DEPARTMENT OF JUSTICE



110 WEST A STREET, SUITE 700
SAN DIEGO 92101
(619) 237-7351

(619) 238-3496

Sent Pursuant to Evidence Code §1154

April 17, 1992

By Telecopier and U.S. Mail

Thomas G. Dent, Esq.
Sayfarth, Shaw, Fairweather & Geraldson
55 East Monroe Street, Suite 4200
Chicago, Illinois 60603

Re: *GNB Incorporated, Metals Division, Vernon, California*

Dear Mr. Dent:

During our February 25, 1992 meeting, we discussed the Department's enforcement action against GNB, and the Department conveyed, for purposes of settlement discussions, a proposed penalty for the company's alleged violations of applicable hazardous waste laws.

Pursuant to the request you made after the close of that meeting, the following is a more detailed summary of the violations which gave rise to the penalties which the Department now seeks. The summary does not assign a specific penalty amount to each violation. Instead, for settlement purposes, I have indicated that the Department views the violations listed in groups A through C and certain violations in group D as extremely serious, while the violations listed in groups E through F are not as egregious, although some do constitute major violations of applicable law.

The Department has set a deadline of May 4, 1992 for the filing of the complaint in this case. Accordingly, if GNB remains interested in resolving this matter prior to filing, please contact me as soon as possible so that we can arrange another settlement meeting.

My Office has assigned Deputy Attorney General Pearl Lattaker to work with me on this case. In the event you cannot reach me for any reason, feel free to contact Ms. Lattaker at (213) 897-2614.

Thomas G. Dent, Esq.
April 17, 1992
Page 2

A. Waste Piles

1. Battery Casing and Separator Waste.

During the May 1989, inspection, Department personnel discovered an illegal waste pile containing battery case and separator waste located at the southeast corner of the facility. This pile was on asphalt and was not covered. It was 10-12% liquid, and liquid was flowing from the pile into the rainwater retention pond. GNB's waste profile sheet indicated that the pile was 1 to 5% lead. The pile was later moved to the Battery Storage Shed, where inspectors saw and sampled it during their September 24, 1987, July 7, 1989 and August 23, 1989 inspections.

During each inspection, Department inspectors informed GNB personnel that maintenance of the pile was illegal because (i) the pile was not included on the Part A Application (22 CCR \$66371); (ii) the pile was not on an impermeable liner with a leachate collection system (\$67341) and it lacked other required protection; and (iii) while it was placed under a roof in 1987, the pile was still exposed to the elements on four sides. Nevertheless, over a two year period, the pile remained. During the August 23, 1989 inspection, a GNB official told investigators that GNB continued to use the waste pile, even though it knew it was illegal, because it was the most cost effective way for the company to deal with this type of waste.

The Department considers this to be an extremely serious violation. The presence of this waste pile constituted illegal disposal of hazardous waste. In addition, in its unprotected condition, the waste pile posed a constant threat of illegal releases of hazardous wastes into the ground, the water and the air. The violation is aggravated by the fact that GNB managers were aware the pile was illegal, but failed to bring it into compliance with the law because of cost considerations. The Department therefore believes this violation warrants a significant penalty.

2. Crushed Drums.

During the August 23, 1989 inspection, the Department discovered a waste pile of crushed drums which had been placed on asphalt in the western portion of the facility. Samples taken from the pile and from the ground underneath it revealed hazardous levels of lead and other substances.

The Department considers this to be another extremely serious violation. By the time of the August 23, 1989 inspection, GNB knew that it had a problem with waste piles, but

Thomas G. Dent, Esq.
April 17, 1992
Page 3

it illegally created this one anyway, without attempting to amend its Part A Application. More importantly, this pile was not placed on concrete, and ground/asphalt samples taken from underneath the pile establish lead contamination. The Department therefore believes that this violation also warrants a very substantial penalty.

B. Shipment of Polypropylene Chips to KW Plastics

Two sets of serious violations arise from the company's handling of its polypropylene chips: The first arises from the fact that these chips were dispatched from GNB in leaking trucks. A second set of violations stems from GNB's general failure to handle this material as a hazardous waste.

1. Leaking Trucks of Polypropylene Chips.

GNB did not test the lead content of the liquid leaking from the polypropylene chips prior to shipping them to KW Plastics. Accordingly, each shipment of these chips threatened to contaminate public roads and highways with hazardous levels of lead. This conduct resulted in the following violations:

1. In failing to test the lead content of the liquid leaking from its polypropylene waste prior to sending the waste off its premises, GNB violated 22 CCR §67120 by failing to operate its facility to minimize the release of hazardous waste to the air and soil.
2. On February 21, 1990, a Wiley Saunders truck carrying GNB scrap polypropylene chip to KW Plastics was stopped at a CHP truck stop. Inspectors took samples of the liquid leaking from the truck, and the samples showed that the leachate was above regulatory limits for lead, and was therefore a hazardous waste.
3. On March 20, 1990, DHS inspectors noticed a disabled Wiley Saunders Truck carrying polypropylene chips from GNB. Liquid leaking from the truck was sampled and was above the regulatory limits for lead. The driver of the truck stated that he felt sorry for the cars that had been following him on the highway, because the leachate from his truck continuously splattered on their hoods and windshields.
4. On September 1, 1989, a DTSC inspector took samples of the liquid leaking from a truck onto the tarmac at GNB's loading dock. The truck contained polypropylene chips which were about to be transported to KW Plastics. The sample revealed hazardous levels of lead.

Thomas G. Dent, Esq.
April 17, 1992
Page 4

In this case, the severity of these violations is compounded by the fact that GNB was given repeated oral and written warnings regarding the polypropylene chips, including the following:

1. Directive to Comply, dated August 30, 1989, informing GNB of the preliminary determination that the polypropylene waste is hazardous and must be handled accordingly and that shipments to KW plastics should cease.
2. September 7, 1989 letter to Ken Clark, informing him that the polypropylene waste is a hazardous waste and must be properly managed in accordance with applicable state and federal laws and regulations.
3. May 9, 1990 ROV to GNB, stating the waste should not be sent to an unpermitted facility and should be manifested.
4. September 21, 1990 letter to Clark, stating that the "polypropylene waste is hazardous waste which must be properly managed in accordance with all applicable state and federal laws."

GNB did not comply with these directives and it continued to contaminate the streets, and highways (and even other vehicles) by sending the illegally leaking shipments of chips to KW. The Department therefore believes that these violations warrant substantial penalties.

2. Failure to handle the Chips as a Hazardous Waste.

Irrespective of the fact that the trucks were leaking, a second set of violations arises from GNB's failure to handle the lead-contaminated chips as a hazardous waste. This failure resulted in the following violations:

§ 25189(c) - Intentional disposal of hazardous, lead-contaminated polypropylene waste at KW Plastics.

§25189(d) - Negligent disposal of this waste at KW Plastics.

§66480 (a) & (b) - Transporting the chips without a manifest to KW Plastics.

§25191(c)(1) - Transporting waste in a truck without a current certificate of compliance.

Given the fact that GNB was repeatedly told that its chips constituted a hazardous waste, the Department believes that GNB's

Thomas G. Dent, Esq.
April 17, 1992
Page 5

failure to handle the chips as such warrants significant penalties.

C. General Lead Contamination of the Facility.

During the December 6, 1990 inspection, DTSC inspectors took the following samples which revealed the following levels of lead:

Mud from berm of truck wash pit:	700,000 mg/kg
Soil from south end of flood control channel:	6,100
Second sample, south end of channel:	1,500
Soil from north end of flood control channel:	below limits
Offsite sample, corner of 26th and Indiana:	6,300
Offsite sample, 26th St. 1/5th mile east of GNB:	1,200
Offsite sample, south side of Bandini Blvd:	2,000

Some of the samples also showed actionable levels of antimony, arsenic and/or copper. Subsequent sampling has also shown high contamination levels at and around the facility.

These samples show that GNB has allowed high levels of lead and metal contamination to accumulate at and around its facility. The Department believes that this violation warrants a substantial penalty.

In addition to the extremely serious violations listed above, the Department has identified the following other violations:

D. Violations cited in the May 30, 1989 Corrective Action Order

The following violations were discovered during inspections in May and September of 1987 and were the basis of the Corrective Action Order, which was withdrawn without prejudice on August 31, 1989. One of the reasons the Order was withdrawn was that the Department felt that the penalties assessed in that Order were too low given the number and nature of the violations:

1. There were no Hazardous Waste Signs at the entrance to the active portion of the facility.
2. GNB failed to make arrangements with emergency response agencies.
3. GNB lacked a waste analysis plan which specified the components of the waste streams.

Thomas G. Dent, Esq.
April 17, 1992
Page 6

4. There was no adequate inspection schedule log.
5. GNB's Contingency Plan was inadequate.
6. GNB lacked a closure plan.
7. There was no Closure Cost Estimate.
8. GNB lacked a training program.

E. Violations cited in the May 9, 1990 ROV.

1. Aisle Space

GNB failed to maintain aisle space required by §67124. (Count 10).

2. Absence of address of foreign generator on manifest.

GNB received waste from a foreign generator with no address on the manifest. (Count 11).

3. Absence of Generator Sections on manifest.

GNB received waste from Mexico and the Generator and Transporter sections of the manifest were not completed. (Count 12).

4. Inspections of surface impoundments

GNB's surface impoundments were not inspected weekly. (Count 13).

F. September 13 & 19, 1990 Observations.

1. Operating Record. GNB lacked an operating record as required by §67163.

2. Closure Plan. GNB's closure plan lacked detail as to the equipment and methods for testing contaminated soil.

3. Contingency Plan. The contingency plan did not list the primary emergency coordinator.

4. Training. No documentation could be provided showing that employees handling hazardous waste had received training within six months of beginning employment.

5. Addition of rubber chips to furnace. GNB failed to quantify the rubber chip which needed to be placed into the furnace as a

Thomas G. Dent, Esq.
April 17, 1992
Page 7

reducing agent. Adding more hard rubber chip than necessary constitutes disposal.

6. Engineering and Laboratory Building. This laboratory was closed in 1985 or 1986. DTSC inspectors found it to be in disarray with open, unlabelled buckets of chemicals.

7. Sampling Lab. This building was littered with sweeping compound with visible lead contamination.

G. December 6, 1990 Inspection.

1. Tin Dross. During the December 6, 1990 inspection, the Department observed 164 drums of tin dross (a friable yellow powder) in the lead oxide warehouse building at the southeast corner of the facility. None of the drums was labelled. 47 more drums were found in the east side of the garage area, and 125 were at the western edge of the garage. Several of the drums were open and some were damaged, and were thus subject to leakage or wind dispersion. This tin dross contained high levels of lead.

2. Broken, leaking batteries. During this and other inspections, DTSC inspectors observed batteries which were broken and/or leaking, stored outside the permitted storage area. The inspectors told GNB that such batteries must be treated as hazardous waste.

H. Other Waste Piles and Open/Unlabeled Drums

Two Drums - July 7, 1989. During the July 7, 1989, inspection, DTSC sampled a solid material from an open drum in the drum storage area and a solid material from an open drum in the west yard. Both were above limits for lead.

Reverberatory Raw Materials Storage Area. During the August 23 and September 1, 1989 inspections, inspectors found three small, unauthorized waste piles in the Reverberatory Raw Materials Storage Area. These piles all showed actionable levels of lead, and some showed elevated levels of barium, antimony and arsenic.

South End of Shelter Building. During the August 2 and September 1, 1989 inspections, the Department also noticed several small, unpermitted waste piles in the south end of the shelter building. These piles all showed elevated levels of lead and antimony and some were above limits in copper arsenic or cadmium.

Thomas G. Dent, Esq.
April 17, 1992
Page 8

I. Violations reported by AQMD investigator.

The AQMD has informed the Department of the following violations:

1. An explosion occurred at GNB on July 12, 1991, when an employee mixed metallic sodium waste with water; GNB is not permitted to accept metallic sodium because it is not a raw material
2. An incident occurred in July 1991 in which a whole battery was placed in the incinerator.

J. February 11, 1992 Inspection

1. GNB stored one pallet of battery cells outside the permitted storage area.
2. GNB placed hazardous waste-water treatment filter media on the facility substrate near the waste water treatment plant.

I hope the above discussion gives you and your clients a better understanding of the Department's position with respect to the issue of penalties.

Prior to any resolution of this case, GNB will need to demonstrate that it has come into full compliance with applicable hazardous waste laws and regulations. The Department's major areas of concern in this regard are set forth in my February 19, 1992 letter to you.

Please contact me or Ms. Lattaker if you have any questions regarding the contents of this letter.

Sincerely,

DANIEL E. LUNGREN
Attorney General



DENNIS A. RAGEN
Deputy Attorney General

cc: Pearl Lattaker, Esq.
Juan Gutierrez, Esq.
Ms. Maxine Richey

DAR/nlc

EXHIBIT H

1. GNB violated HSC § 25189(c) and 22 CCR § 67120, to wit:

On or about February 21, 1990 and March 14, 1990, GNB dispatched polypropylene chips from its premises in trucks operated by Wiley Sanders Truck Lines, Inc., which were not watertight. Samples taken from the leachate falling from the trucks onto the highway showed that this leachate was contaminated with California hazardous waste levels of lead.

2. GNB violated 22 CCR § 67120, to wit:

During the period from September 1, 1989 until sometime after March 14, 1990, GNB failed to test the lead content of the liquid leaking from its polypropylene waste prior to sending the waste off its premises in non-watertight trucks.

3. GNB violated 22 CCR §§ 66341 and 66371, to wit:

On or about May 6 1987, September 24, 1987 and August 23, 1989, GNB maintained unpermitted piles of its battery separator case waste, pending shipment to a hazardous waste disposal facility, without satisfying all the requirements of sections 66341 and 66371.

4. GNB violated 22 CCR § 66341 and 66371 to wit:

On or about August 23, 1989, GNB placed a pile of crushed drums on the asphalt surface of its facility. The pile contained hazardous waste levels of lead, arsenic and antimony; it was not covered; it was not placed on an impermeable liner and there was no leachate collection or removal system.

1 5. GNB violated 22 CCR § 67105(d)(3), to wit:

2 On or about September 19, 1990, upon request by
3 Department inspectors, GNB was unable to provide documentation
4 showing that employees handling hazardous waste had received
5 training within six months after beginning employment.

6 6. GNB violated 22 CCR § 66265.15(d) and ISD Part
7 III(5)(d) to wit:

8 During the period from February 8, 1992 to February 23,
9 1992, GNB did not maintain inspection logs.

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I. BACKGROUND

The recycling of spent lead acid batteries is a vital and well established component of the U. S. economy. Recycled, or secondary lead accounts for over sixty percent of the lead used in the United States and, with the current movement to stop the production of virgin lead in the U.S. will continue to increase throughout the decade. As we approach the 21st century with electric vehicles becoming more of a reality, it is believed by GNB that the lead acid battery will be the power plant of choice which will demand higher capabilities for recycling and more innovative and cost effective ways to recapture and recycle all the components of spent batteries.

Existing smelting capacity and technology will not be adequate to meet the demand. Even if additional furnace capacities were built, air pollutant emissions and solid waste disposal problems will increase. The current smelting process technology emits air pollutants such as lead particles, sulfur dioxide, oxides of nitrogen and generates a slag that must be landfilled.

GNB, Incorporated has been following the research and development on the electrowinning of lead for several years and believes that the technology and economic feasibility now exists to engineer and build a commercial scale electrowinning plant capable of producing 10,000 tons per year.

GNB, Incorporated plans to install this commercial scale plant at its existing smelter operation in Vernon, California. The plant will also install a new 100,000 ton per year CX battery breaking facility as part of the total project to provide clean desulfurized battery paste as raw material for the electrowinning system leaching circuit.

The goals of this commercial scale plant are:

- To design, construct and operate a lead electrowinning plant of sufficient size to demonstrate the technical and economic viability of the process.
- To generate design data and criteria for a full scale industrial electrowinning plant.

II. PROJECT DESCRIPTION

Electrowinning Technologies, Inc. proposes to provide the basic design for a complete electrochemical recovery system for lead and the other components of spent lead-acid batteries. The project's design capacity will be 100,000 tons per year for the CX breaker and 10,000 tons per year for the electrowinning process.

The CX-EW process is a clean technology through which both the collected batteries and the production wastes are recycled, yielding products which can be reused in battery manufacturing.

The CX process with desulfurization phase will be located in a new facility at the south end of the existing RMPS building and consist of approximately 10,000 sf. The EW process will be located in a new facility at the north end of the existing smelter building and consist of approximately 30,000 sf.

The CX-EW process will be the Engitec CX-EW process as developed by Engitec-Impianti S.p.A., Milan, Italy.

The project's needs relating to site, structural, foundations, electrical and mechanical, will be fully developed in coordination with the process equipment and process instrumentation and control systems to provide a complete and operable CX-EW system capable of 100,000 tons of lead bearing raw materials per year and 10,000 tons of electrowinning lead per year.



III. PROCESS DESCRIPTION

CX BREAKER AND DESULFURIZATION

The proposed equipment is based on the last evolution of the CX Battery Component Separation Technology by Engitec Impianti S.p.A. with the special paste washing operation necessary to prepare the proper feed to the electrowinning plant.

Most of the proposed equipment is especially designed or selected for the lead battery treatment process after several experiences in different plants and conditions, in order to guarantee the long operation time and the necessary reliability in the heavy service required by such technology.

Moreover, the design of the proposed equipment is "safe and health work place" oriented designed to meet OSHA requirements incorporating:

- acid mist collection devices
- spill collection and containment
- low noise design
- easy maintenance features
- minimized manual cleaning of inside parts

The attached Block Diagram Drawing PFD-1 shows the operation components of the proposed system.

The plant is composed of the following units:

1. Battery loading system
2. Acid electrolyte collection, filtration and storage
3. Battery crushing and component separation
4. Paste desulfurization and washing
5. Acid mist collection and scrubbing system



The plant layout provides for easy access and maintenance of all equipment via fork lifts or similar equipment. The overall dimensions are approximately 85 feet in width x 130 feet in length. The maximum elevation of the equipment is approximately 32.5 ft.

After the breaking and separation of the various components of the scrap batteries and the desulfurization of the lead paste through a CX Battery Treatment Plant, the paste leaching section will dissolve the lead, oxides and carbonate, and resaturate the recirculating electrolyte.

The enriched solution is fed to the electrolysis section where metallic lead is cathodically deposited on stainless steel blanks. Cathodes sheets of practically pure lead are stripped from the blanks and sent to further processing.

Technology Features

The electrowinning plant is designed in accordance with Engitec Impianti technology as developed during the pilot plant test work. The key features of the proposed lead electrowinning plant are:

- The proprietary anode design and cell operating conditions specified by Engitec Impianti allow application of relatively high cathode current densities. The nominal design current density is approximately 320 amperes per square meter of submerged cathode surface. The capital cost requirements for the installation of the electrowinning section is therefore relatively low;
- Low electric power requirement because of high current efficiency operation and minimum stray current losses. This is achieved by careful layout of the electrical and piping systems, and by electrically insulating process equipment, such as electrolytic cells, bus bar and selected pumps from ground;
- Minimum sludge from the electrolytic cells is produced. A very small quantity of products from the oxidation of the additives (lignin sulphonate and glue) has to be cleaned up every 8 to 10 months).

INSOLUBLE ANODE FOR ELECTROWINNING

The key of the Lead Electrowinning technology is the new type of insoluble Anode, patented by BUS Engitec, which is suitable for the electrolytic extraction of heavy metals from aqueous solutions.

The anode is composed of:

1. A set of bimetallic Cu/Ta rods, coated with a catalytic layer of Pt and/or PbO₂, acting as an electrode with preferential development of oxygen;
2. A copper bar having the function of current conductor, with vertical and horizontal holes for inserting and fastening the rods;
3. A frame in plastic insulating material for fastening the structure and for the proper positioning of the anode into the cell.

The advantages of the Engitec Impianti anode with the development of oxygen can be summarized as follows:

- High electrical conductivity: copper represents about 90% of the bimetallic rods' cross section; each anode is capable of conducting, with minimum losses, currents of many hundreds of amperes;
- Lightness: this structure weights less than 50 lb, therefore the structure of the electrolytic cell is very simplified;
- Reduced overall dimension of the metallic components of the anode: the distance of the electrodes opposite in sign can be reduced to a minimum;
- Inalterability of the anodic structures: the tantalum that provides a continuous and compact coating of the conducting copper is the best anti-corrosive material available;
- Acceptable over voltage of oxygen: the catalytic layer of Pt and/or PbO₂, that coats the copper/tantalum rods allows the development of oxygen at the same voltage as on the lead anode as for other metals commonly produced by electrowinning.

The structure with parallel vertical rods, each one well spaced from the others, helps the dissipation of the anodic gas bubbles, the free circulation of the electrolyte and the continuous renewal of the solution at the interface cathode/solution. The cathodic current density can be therefore raised up to the maximum levels allowed by the concentration of lead ions in the electrolyte.

PROCESS DESCRIPTION FOR 50 sht/h CX BREAKER AND DESULFURIZATION FOR EW PLANT

Basic Design Data

Design Capacity:

50 sht/h SLI drained batteries

Operating Factor:

16 hours/shift

5 days/week

40 weeks/year

Products and By-Products

The following products and by-products are expected to be produced by the plant:

Grids & Poles, Separators and Others

Desulphurized Paste:

Total metal contents as is: 68.00% b.w.

Moisture contents as is: 9.00% b.w.

Total sulphur contents as is: 0.20% b.w.

Sodium Sulphate Solution

To be sent to the plant's waste water treatment system.

Design Battery Mix

The plant is designed for the treatment of "mixed" batteries with external cases in polypropylene and/or ebonite.

The mix is assumed to include a maximum of 15% of industrial batteries.

The electrolyte is assumed to contain 19% b.w. of H_2SO_4 .

The batteries have the maximum diagonal dimension of 800 mm (31 inch).

Steel cases or external reinforcement are assumed to be removed before treatment.

Utilities and Chemicals Consumption

Electric Power:	installed power:	1350 KW
	absorbed power:	1000 KW
Chemicals:		(20 KWH/1 Sht of full batteries)
	Soda Ash:	250 lb 1 Sht of full batteries
		on average of 25% electrolyte at 19% H_2SO_4
	flocculent:	5 gr./1 Sht of full batteries

PROCESS DESCRIPTION FOR 10,000 sh/yr ELECTROWINNING PLANT

The Lead Electrowinning Plant, having a production capacity of 10,000 short tons per year of lead cathodes, is composed of the following main sections:

- Paste leaching
- Feed electrolyte circulation and storage section
- Spent electrolyte storage section
- Electrolyte purification section
- Electrolyte concentration section
- Electrowinning cell room section
- Gas scrubbing section
- Chemicals preparation section
- Cathode treatment section, including washing, lead stripping and cathode blank separation.
- Electric power distribution and current conversion section

BASIC DESIGN CRITERIA

Plant Location

The new electrowinning plant will be installed at the existing Los Angeles Recycling Facility of GNB Incorporated, in California.

Plant Capacity

The electrowinning plant will have a production capacity of 10,000 short tons per year of lead cathodes.

Operating Factor

The plant is designed to operate 24 hours/day, 7 days/week, 49 weeks/year.

Feed Material

The plant is designed to treat a desulfurized lead paste as received from the CX battery scrap recovery plant.

Chemicals

The following chemicals are required by the process:

calcium lignin sulfonate:

boric acid: crystals technical grade

glue:

phosphoric acid: 75% solution, technical grade

Hydrofluoric acid: 40% solution, technical grade

Emulsive oil:

Utilities requirements

The following utilities shall be available at battery limits:

Process water	Flow rate	44 gals/min
	Pressure	60 psig
	Temperature	77 °F
Electrical power	4.17 kV \pm 5%, 3 Ph, 60 Hz - 2000 kVA for electrolysis	
	480 V 3 Ph, 60 Hz - 500 KVA for motors	
Compressed air	Flow rate 800 SCFM (400 SCFM of which deoiled and dried for instrumentation) - pressure - 100 psig	

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



January 12, 1993

CERTIFIED MAIL

Mr. William McKusky, Environmental Manager
GNB Incorporated, Resource Recycling Division
2700 South Indiana Street
P.O. Box 23957
Vernon, California 90023-0957

Dear Mr. McKusky:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On October 27 & 28, 1992, representatives of the Department of Toxic Substances Control (DTSC) conducted inspections of GNB Incorporated, Resource Recycling Division located at 2700 South Indiana Street, Vernon, 90023 (CAD097854541).

As a result of these inspections, violations of hazardous waste statutes and regulations were identified.

Specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in DTSC citing you for continuing/additional violations.

I. Schedule of Violations

COUNT 1: California Code of Regulations (Cal. Code Regs.), Title 22, Section 66265.173 (a).

GNB stored two hazardous waste containers that were not closed in the reverberatory furnace building. These containers were covered but the lids were not secured. At the time of the inspection, waste was not being added to or removed from these containers.

COUNT 2: Health and Safety Code, Chapter 6.5, Section 25189 (d).

GNB stores hazardous waste at a point which is not authorized (e.g. lead acid batteries stored in the west yard, unlabelled containers, and waste bundles received from KW Plastic).

COUNT 3: Cal. Code Regs., Title 22, Sections 66265.15 (a) and 66265.226 (a) and Interim Status Document (ISD) Part III. 5. (a).

Inspections are not conducted for GNB's rainwater retention pond located at the south end of the facility.

Mr. William McKusky
GNB, Inc.
Page 2

COUNT 4: Cal. Code Regs., Title 22, Sections 66265.56 (j) and ISD Part III 17. (j).

A written report was not submitted to the Department within 15 days (according to the regulations) nor 30 days (according to the ISD) after a fire occurred in GNB's blast furnace feed storage room.

COUNT 5: Cal. Code Regs., Title 22, Section 66265.73 (b) (13).

Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 90787820, 90787819, 92124889, 88316378, 88316367, 91782572, 91657969, and 90149556 under which EPA Waste Number D008 was received by GNB.

COUNT 6: Cal. Code Regs., Title 22, Section 66268.7 (a) (b).

Copies of Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 91529490, 90982474, 91529515, and 91529512 under which EPA Waste Number D008 was shipped offsite.

COUNT 7: Cal. Code Regs., Title 22, Section 66265.15 (d) and ISD Part III. 5. (d).

Inspection logs were not maintained between 2/8/92 and 2/23/92. The Environmental Clerk was on vacation and the inspection logs were not completed in his absence.

COUNT 8: Cal. Code Regs., Title 22, Section 66266.81 (b) (1).

GNB did not store damaged batteries inside closed containers.

COUNT 9: Cal. Code Regs., Title 22, Section 66265.35.

GNB did not maintain aisle space at the battery storage areas nor for the batteries stored in the west yard.

COUNT 10: Cal. Code Regs., Title 22, Section 66265.73 (b) (2) and ISD Part IV. 1. (b) (2).

GNB did not cross-reference, in the operating record, the storage location of hazardous waste received under manifest with the appropriate manifest document numbers.

Mr. William McKusky
GNB, Inc.
Page 3

COUNT 11: Health and Safety Code, Chapter 6.5, Section 25143.9 (a).

Containers stored in the battery storage area were not marked with the words "Excluded Recyclable Material". These containers were identified on a bill of lading as having been generated at GNB's facility in Frisco, Texas.

II. Schedule for Correction

Correct all violations upon receipt of this Report.

Please submit written verification to this office by February 8, 1993, that the above violation(s) have been corrected.

All submittals to the Department, as requested above, must contain the signed certification as required by Section 66270.11, Title 22, California Code of Regulations.

The Department will conduct a reinspection of GNB to verify compliance.

The issuance of this Report Of Violation and Schedule of Compliance does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Jerry Lile at (818) 567-3052.

Sincerely,

Maxine Pichey, for

Scott Simpson
Branch Chief
Facilities Management Branch

CERTIFIED MAIL
P 390 273 593
(Return Receipt Requested)

Mr. William McKusky
GNB, Inc.
Page 4

cc: Mr. James R. Cutright
Acting Chief Counsel
Office of Legal Counsel
California Environmental Protection Agency
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
California Environmental Protection Agency
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Larry Matz, Acting Chief
HQ's Surveillance and Enforcement
California Environmental Protection Agency
Department of Toxic Substances Control
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Ms. Maria Kelly
Waste Compliance Branch
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street (W-4-2)
San Francisco, California 94105

Mr. Joe Karbus
Division Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
5925 Rickenbacker Road
Commerce, California 90040

Mr. Robert Ghirelli
Executive Director
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

Mr. William McKusky
GNB, Inc.
Page 5

cc: Mr. Norman Michiels, Director
Environmental Health Department
City of Vernon
4305 Santa Fe Avenue
Vernon, California 90058

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION (REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

Tel: (818) 567-3000



December 13, 1989

CERTIFIED MAIL

Mr. David H. Fell, President
David H. Fell & Co., Inc.
4176 Pacific Way
City of Commerce, CA 90023

Dear Mr. Fell:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On November 9, 1989, Richard Jones, Paul Baranich and Rachel Carlin representing this Department, along with David Baltazar representing the Los Angeles County Department of Health Services (LACDHS) conducted an inspection at your facility located at 4176 Pacific Way in the City of Commerce, California (EPA ID No. CAD981384332).

As a result of that inspection, violations of the hazardous waste statutes and regulations were identified.

The specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in the Department citing David H. Fell & Co., Inc. (DHF) for continuing/additional violations.

I. VIOLATIONS:

COUNT 1: Health and Safety Code section 25189.2.

Soil sample PBDHF06 taken from a dirt area at the southeast corner of the site near the railroad tracks and wastewater treatment system was found to be hazardous due to total metal concentration, pursuant to title 22, Cal. Code Regs., section 66699.

COUNT 2: Title 22, Cal. Code Regs., section 67120 (a).

The DHF facility was not maintained and operated to minimize the possibility of any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water which could threaten human health or the environment, to wit: numerous open and/or uncovered containers of slag were being stored in and around the west yard. Samples taken from the ground and from open bins and containers showed that hazardous waste and hazardous waste constituents are not being properly managed. In addition, containers of spent caustic had been overfilled and allowed to spill onto the ground in the wastewater treatment area.

COUNT 3: Title 22, Cal. Code Regs., section 67243 (a).

DHF stored hazardous waste in open and/or uncovered containers, to wit: three open containers of charred and burnt printed circuit boards, three open containers of detergent sludge from the sink trap of a jeweler, an open bin of calcium hydroxide sludge and several open bins of base metal hydroxide sludge. Samples taken from the above containers or bins were found to be hazardous due to total metal concentration.

COUNT 4: Title 22, Cal. Code Regs., section 66508 (c).

DHF stored hazardous waste in containers and bins, identified in Count 3, which were not labeled with all of the required information.

COUNT 5: Title 22, Cal. Code Regs., section 67212 (a).

DHF did not have a written closure plan.

COUNT 6: Title 22, Cal. Code Regs., section 67212 (e).

DHF did not submit its closure plan to the Department 180 days before the date it expects to begin closure. The facility operators stated that they have plans to move from their present location during the month of December 1989 and/or January 1990.

COUNT 7: Title 22, Cal. Code Regs., section 67002.

DHF did not have a written cost estimate of closing the facility.

COUNT 8: Title 22, Cal. Code Regs., section 67103.

DHF did not have a sign with the legend, "Danger Hazardous Waste Area-Unauthorized Personnel Keep Out", in both English and Spanish, posted at each entrance to the active portion of the facility.

COUNT 9: Title 22, Cal. Code Regs., section 67104.

DHF did not develop and follow a written inspection schedule for inspecting monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.

Mr. David H. Fell
Page 3
December 13, 1989

COUNT 10: Title 22, Cal. Code Regs., section 67105 (4).

DHF did not maintain records that document that the training or job experience required under subsections (a), (b) and (c) of this section have been given to and completed by facility personnel. Since the training plan was just developed, documentation of training has not yet been developed.

COUNT 11: Title 22, Cal. Code Regs., section 67126.

DHF has not made arrangements to familiarize emergency response teams with the layout of the site, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes. In particular, the Los Angeles County Department of Health Services is not included in its contingency plan.

COUNT 12: Title 22, Cal. Code Regs., section 67142.

DHF did not submit copies of its contingency plan to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon in an emergency. Since the contingency plan was just recently developed copies have not yet been sent.

COUNT 13: Title 22, Cal. Code Regs., section 67102 (b).

DHF has not developed and followed a written waste analysis plan which describes the procedures which will be carried out to comply with subsection (a) of this section.

COUNT 14: Title 22, Cal. Code Regs., section 67166.

DHF did not submit an unmanifested waste report for hazardous waste that was accepted for treatment without an accompanying manifest within 15 days after receiving the waste. Specifically, when the detergent sludge, charred and burnt circuit boards and cyanide wastes were not accompanied by a manifest.

COUNT 15: Title 22, Cal. Code Regs., section 67161 (a)(1).

DHF failed to sign manifest # 87774571 upon its receipt at the facility.

COUNT 16: Title 22, Cal. Code Regs., section 67165.

DHF has failed to prepare and submit to the Department annual reports for the previous three years.

Mr. David H. Fell
Page 4
December 13, 1989

COUNT 17: Title 22, Cal. Code Regs., section 67165.

DHF did not maintain an operating record which records a description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility; the location of each hazardous waste at the facility and the quantity at each location, including cross references to specific manifest document numbers, if the waste was accompanied by a manifest; records and results of waste analyses performed; records and results of inspections; notices to generators as specified in title 22, Cal. Code Regs., section 67101; and closure cost estimates as required under title 22, Cal. Code Regs., section 67002.

II. SCHEDULE FOR COMPLIANCE:

1. Correct violations upon receipt of this Report.


Please submit a written certification, which contains the language in title 22, Cal. Code Regs., section 66373 (d), to this office by January 13, 1989, that the violations have been corrected. Such certification should address the deficiencies noted in Counts 1 through 17 above.

The Department will conduct a re-inspection of David H. Fell & Co., Inc. to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Richard Jones at (818) 567-3025.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Simpson", followed by a small "for" written in the same script.

Scott Simpson, Chief
Surveillance and Enforcement Unit

SS:RJ:rj

cc: See Next Page

Mr. David H. Fell
Page 5
December 13, 1989

cc: William Soo Hoo, Assistant Chief Counsel
Toxics Legal Office
Toxic Substances Control Program
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mary Locke, Chief
Office of Local Enforcement
Toxic Substances Control Program
714/744 "P" Street
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Sacramento, CA 94234-7320

Don Johnson, Chief
HQ's Surveillance and Enforcement Section
Toxic Substances Control Program
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Lucille van Ommering, Chief
Financial Responsibility Unit
Toxic Substances Control Program
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Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 S. Grand Ave., Rm. 607
Los Angeles, CA 90007

Theodora Berger, Assistant Attorney General
Environmental Law Section
Office of the Attorney General
3580 Wilshire Blvd., Suite 800
Los Angeles, CA 90010

David Guthman, Deputy District Attorney
Environmental Crimes/OSHA Division
320 W. Temple Street, Room 340
Los Angeles, CA 90012

Mr. David H. Fell
Page 6
December 13, 1989

Gary Lance
Waste Compliance Branch
U.S. Environmental Protection Agency
Region IX
215 Fremont Street (T-2-4)
San Francisco, CA 94105

Robert Ghirelli, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Center Plaza Drive
Monterey Park, CA 91754-2156

Certified Mail
P 757 543 740
R R R

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320

(916) 324-3752



NOV 08 1989

M. J. Little
GNB. Incorporated
Post Office Box 64100
St. Paul, Minnesota 55164-0100

Dear Mr. Little:

STATUS OF FINANCIAL RESPONSIBILITY FOR: GNB, INCORPORATED
EPA ID# CAD097854541

We have reviewed the documents submitted to this office by your corporation on behalf of the above-named facility pursuant to the financial responsibility requirements of the California Hazardous Waste Management Program.

The documents reviewed meet all of the criteria required by Article 17, Title 22 California Code of Regulations. As such, the above-named facility is deemed to be in full compliance with these requirements at this time.

We appreciate your cooperation in these matters. If we can be of further assistance, please feel free to contact Richard Castle at (916) 324-2431.

Sincerely,

Lucille van Ommering, Chief
Financial Responsibility Unit
Toxic Substances Control Program

cc: John Hinton
Facility Permit Unit
Region 3

Scott Simpson
Surveillance and Enforcement
Region 3

Arnold Robbins
EPA - Region IX

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504

(818) 567-3000



April 2, 1992

CERTIFIED MAIL

Mr. Kenneth G. Clark
Technical and Environmental Manager
GNB, Inc.
2700 South Indiana Avenue
Los Angeles, California 90023-0957

Dear Mr. Clark:

REPORT OF VIOLATION AND SCHEDULE OF COMPLIANCE

On February 11, 1992, Wendell Francisco and Nancy Steele, representing the California Environmental Protection Agency, Department of Toxic Substances Control (the Department), conducted a focused inspection of GNB, Inc., 2700 South Indiana Avenue, Los Angeles, California (CAD097584541).

As a result of this inspection, violations of hazardous waste statutes and regulations were identified. The specific violations and required corrective action are listed below. Failure to correct the identified violations within the schedule provided will result in DTSC citing you for continuing/additional violations.

I. VIOLATIONS

COUNT 1: Title 22, California Code of Regulations (Cal. Code Regs.), section 66270272(a)(1). Changes During Interim Status.

On or about February 11, 1992, GNB stored one pallet of battery cells outside the battery storage area, next to the truck weigh scales.

COUNT 2: Title 22, California Code of Regulations (Cal. Code Regs.), section 66265.31. Maintenance and Operations of Facility.

On or about February 11, 1992, GNB failed to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment in that GNB placed hazardous wastewater treatment filter media on the facility substrate near the wastewater treatment plant and left it uncovered or contained.

II. SCHEDULE FOR CORRECTION

1. Correct violations upon receipt of this Report.

Mr. Kenneth G. Clark

April 2, 1992

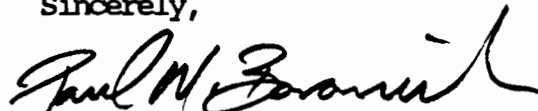
Page 2

Please submit written certification, which contains the language in Title 22, California Code of Regulations, section 66270.11(d) to this office within 30 days of receipt of this Report that the violations have been corrected. The Department may conduct a reinspection of GNB to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil, or criminal actions as a result of the violation noted herein.

If you have any questions regarding this Report, please contact Nancy Steele of our office at (818) 567-3020.

Sincerely,



Paul M. Baranich
Senior Hazardous Materials Specialist

Certified Mail

P 573 965 395

(Return Receipt Requested)

cc: Mr. James R. Cutright
Acting Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Don Johnson, Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
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Ms. Maria Kelly
Waste Compliance Branch (H-4-1)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Kenneth G. Clark

April 2, 1992

Page 3

cc: Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, California 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320

(916) 324-3752



OCT 16 1989

M.J. Little
GNB, Incorporated
Post Office Box 64100
St Paul, Minnesota 55164-0100

Dear Mr. Little:

WARNING LETTER/
EPA ID #CAD097854541

On October 11, 1989, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 2700 South Indiana Street in Los Angeles, California.

As a result of this review, we have determined that the facility is in violation of Title 22, California Code of Regulations (CCR), section 67027 by failing to provide a copy of an independent certified public accountant's report on examination of the owner or operator's financial statements for the latest completed fiscal year, or a copy of the owner or operator's financial statements for the latest completed fiscal year.

Please submit the additional information immediately. If the requested information is not available for review, please submit a certificate of insurance, letter of credit, surety bond, trust fund, or alternative mechanism to demonstrate the required liability coverage.

The issuance of this Warning Letter does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

If you have any questions regarding this Warning Letter, please contact Richard Castle at (916) 324-2431.

Sincerely,

Lucille van Ommering, Chief
Financial Responsibility Unit
Toxic Substances Control Program

Enclosures

cc: (See Next Page)

M.J. Little
Page 2

cc: John Hinton
Facility Permitting Unit
Region 3

Scott Simpson
Surveillance and Enforcement
Region 3

\ Arnold Robbins
EPA - Region IX

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814



(916) 324-2423

JAN 02 1989

M. J. Little
GNB, Incorporated
Post Office Box 64100
St. Paul, Minnesota 55164-0100

CERTIFIED MAIL

Dear Mr. Little:

REPORT OF VIOLATION
EPA ID #CAD097854541

On March 11, and November 17, 1988 the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 2700 South Indiana St. in Los Angeles, California.

As a result of this review, we have determined that the facility is in violation of Title 22, California Code of Regulations, section 67027 by failing to provide adequate liability coverage for sudden accidental occurrences. The September 28, 1988 letter in support of the use of the financial test to demonstrate financial responsibility for liability coverage indicates \$8 million annual aggregate liability coverage to be demonstrated. This needs to be increased to \$10 million annual aggregate liability coverage:

- o \$2 million annual aggregate for sudden accidental occurrences is required for the California facility.
- o \$8 million annual aggregate for sudden and non-sudden accidental occurrences is required for facilities outside of California.

Please submit the following immediately:

A new financial test, or alternative mechanism to demonstrate liability coverage. The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

If you have any questions regarding this Report of Violation, please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

Caroline Cabias, Chief
Hazardous Waste Management Section
Toxic Substances Control Division

M. J. Little
Page 2

Enclosures

cc: Ramon Perez
Toxics Legal Office

Permit Office
Region 3

Dave Chase
Surveillance and Enforcement
Region 3

Pat Rodriguez
Surveillance and Enforcement
Region 4

Arnold Robbins
EPA - Region IX

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814



(916) 324-2423

MAR 11 1988

GNB Incorporated
Post Office Box 64100
St. Paul, Minnesota 55164-0100

CERTIFIED MAIL

Dear Sir:

REPORT OF VIOLATION - EPA ID #CAD097854541

On March 8, 1988, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 2700 South Indian, Vernon, California.

As a result of this review, we have determined that the above-named facility is not in compliance with State laws requiring liability coverage and financial guarantees for closure costs. Specifically, the facility is in violation of Title 22 California Code of Regulations Section 67027 by failing to provide liability coverage for sudden accidental occurrences. The facility is also in violation of Title 22 CCR 67003 by failing to provide evidence of financial assurance for closure costs.

Be advised, you must immediately submit the following:

1. A certificate of insurance, financial test, or alternative mechanism to demonstrate liability coverage for sudden accidental occurrences of \$1 million per occurrence with a \$2 million annual aggregate per facility for sudden accidental occurrences; and \$3 million per occurrence per facility with a \$6 million annual aggregate per facility for non-sudden accidental occurrences.
2. Financial documents to satisfy the requirements of financial assurances for closure costs. These documents must be in the form of a trust fund, surety bond, letter of credit, closure insurance, or financial test/corporate guarantee, or alternative mechanism. Forms are also enclosed for your convenience.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

GNB Incorporated
Page 2

If you have any questions regarding this Report of Violation, please contact Diana Thomas at (916) 324-2997.

Sincerely,



Caroline Cabbias, Chief
Hazardous Waste Management Section

cc: Permit Unit
Southern California Section

Surveillance and Enforcement
Southern California Section

Arnold Robbins
EPA - Region IX

6/9/87

HWDMS QUALITY ASSURANCE CHECK LIST

FACILITY ID C101	FACILITY NAME C104	GEN C1101	TRAN C1102	TSDF C1103	PERMIT STATUS C1105	LDF STATUS C305	Inspection Status C309
40 097 854 541	GNB-L.A. SHELTER	/	X				

STATE INFORMATION

EPA FILE INFORMATION

MISSING

RECOMMENDATIONS

FILE. FACILITY ALREADY WITHDRAWN & NOT IN "ACTIVE" UNIVERSE.

OK
WDL
6/17/88

DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380



May 28, 1987

STAN
Mr. Michael Feeley
U.S. Environmental Protection Agency
215 Fremont Street
Region IX
San Francisco, CA. 91405

Dear Mr. Feeley:

It was previously requested that GNB Incorporated (Los Angeles Smelter), EPA ID # CAD097854541, be deleted from our biennial inspection commitments. Further file review has led us to the conclusion that the facility has not been granted a variance/exemption from the Hazardous Waste Facility Permit (HWFP) requirements, therefore, it must be inspected as a Treatment, Storage, and Disposal Facility. We request a retraction of our request for a deletion. An inspection will be scheduled to meet our inspection commitments for FY 86/87.

On February 2, 1982, GNB applied for an exemption from the HWFP requirements. The Department stated the application would be granted upon notification of new smelter operation. No notification was received. The enclosed documents support our conclusion.

Please contact Nennet Alvarez at the above telephone number for further inquiry. Thank you.

Sincerely,

for Nennet V. Alvarez
Mel Knight, Chief
Surveillance and Enforcement Unit
Southern California Section
Toxic Substances Control Division

MK:lv

Enclosures

cc: Paul Blais, Chief
Surveillance and Enforcement
Toxic Substances Control Division
714/744 P Street
P.O. Box 942732
Sacramento, CA. 94234-7320

Memorandum

To : John Hinton, Supervising Engineer
Southern California Section

Date : August 26, 1986

Subject: Permit requirements
for GNB, Inc.

From : Robert McCormick
Alternative Technology and Policy
Development Section
Toxic Substances Control Division

RMC

VERNON



This memo is in response to Gautam Guha's request for comments on Lake Engineering and Development, Inc.'s (Lake Engineering) letter dated May 12, 1986 for a determination on the permit requirements for GNB, Inc.'s facility in Vernon, California. Following is an identification of the issues raised in the May 12 letter and a response to these issues based on interpretation of the relevant laws and regulations.

Issues:

Facility information includes:

- GNB, Inc. produces lead alloys from "scrap" materials.
- Scrap materials consist of lead-acid batteries, scrap from battery manufacturers, and other lead by-products.
- GNB, Inc. has implemented a Raw Material Preparation System (RMPS) where components are segregated and prepared for additional processing in reverberatory blast furnaces.

Waste materials generated at the GNB, Inc. facility identified in the May 12 Lake Engineering letter:

- Polypropylene plastic is reclaimed for sale as a raw material to secondary plastic resin manufacturers.
- Flue dust (069) generated from the smelting operation is re-entered into the RMPS system via an enclosed conveyor system.
- Hazardous wastes, hard rubber chips and blast furnace slag are disposed of at a secure hazardous waste landfill.

"Raw materials" entered, or proposed to be entered, into the RMPS system before being submitted to the blast furnaces which Lake Engineering claims are, or should be, exempt from permitting requirements:

- Lead-acid storage batteries.
- GNB, Inc's smelting operation's flue dust (K069).
- duPont's emission control dust (K069), (proposed).

Lake Engineering suggests that, in order to satisfy the Hazardous Waste Manifest requirements for the duPont flue dust, the record keeping and annual

August 26, 1986

reporting requirements for lead-acid storage batteries contained in Section 66822 California Administrative Codes (CAC) be used in lieu of requiring GNB Inc. to obtain a TSD permit. Lake Engineering claims this substitution will sufficiently meet California, New Jersey, and Federal requirements for management of the duPont flue dust.

Responses:

The flue dust (K069) generated by GNB, Inc.'s smelting operation and re-entered into the RMPS system would be exempt, according to Section 25143.2(b)(1), Health and Safety Code (HSC) (on-site recycling and reuse of a recyclable material), from the requirements of the Hazardous Waste Control Laws and Regulations.

Lake Engineering suggests that since GNB, Inc. uses lead-acid batteries as its primary raw material, these batteries are exempt from regulation under Section 25143.2(b)(5), HSC. This determination is incorrect. The exemption under Section 25143.2(b)(5), HSC, requires that the material not be treated before it is used as a raw material. The nature of lead-acid storage batteries requires that the non-lead components (e.g. electrolyte, casing) be separated from the recyclable lead components, and that the lead oxides be reduced before being smelted into lead alloys. These pretreatment requirements are referred to in the Lake Engineering letter: "There (in the RMPS system), components of the scrap are segregated and prepared for additional processing in the plant's reverberatory and blast furnaces." Clearly, the batteries do not qualify for exempt status under Section 25143.2(b)(5), HSC.

According to Sections 66822(a)(8) and 66822(a)(9), CAC, facilities that drain the electrolyte from lead-acid batteries or manage cracked or otherwise damaged lead-acid batteries (including the process of breaking them) are subject to the full requirements of Chapter 30, Title 22, CAC, for facility operations and permitting requirements. The GNB, Inc. operation apparently qualifies for either a Resource Recovery Facility Permit Series A or B. GNB, Inc. may possibly qualify for a Series C permit if the lead alloys are used as final products for GNB, Inc.'s battery production or other related production processes (i.e. GNB Inc. is the end user of the waste). Eligibility for either a Series A, Series B, or Series C permit depends on the facility's operating parameters which we can not determine from the information available.

The emission control dust (K069) from duPont does not qualify for exemption under Section 25143.2(b)(5), HSC, for two reasons. First, Section 25143.2(c)(6), HSC, states that any material that is regulated by the EPA pursuant to Subtitle C of RCRA, if it is to be recycled, does not qualify for the exemptions provided in subsection (b). The fact that the duPont flue dust requires a manifest for transportation in order to comply with Federal regulations indicates that the material is regulated by the EPA.

August 26, 1986

Second, I have contacted Mr. Michael Sappington from Lake Engineering in order to obtain more details on the composition of the duPont flue dust. Mr. Sappington has mailed me an analysis that identifies the presence of some compounds (e.g. chlorides, sulfates, oxides) that must be segregated from the lead before the lead can be smelted to lead alloys (see attached letter). In other words, the duPont flue dust must be treated before it can be used as a raw material in GNB, Inc.'s process. The duPont flue dust is not eligible for exempt status under Section 25143.2(b)(5).

In response to Lake Engineering's suggestion to use the annual reporting requirements identified in Section 66822, CAC, in order to track the duPont flue dust and satisfy New Jersey and Federal manifesting requirements, I have solicited the opinion of the chief of the transportation unit. He has stated that since the duPont flue dust does not qualify for the exemption under Section 25143.2(b)(5), HSC, the flue dust must be managed as a fully regulated waste. Attempting to "squeeze" the flue dust into the reduced regulations intended to specifically apply to lead-acid storage batteries will only subvert the existing laws and regulations. He has suggested that we do not allow the duPont flue dust to be managed under the reduced regulations of Section 66822, CAC, unless this provision is allowed through a variance to the facility. This variance must be at least as stringent as EPA's requirements.

In concluding, GNB, Inc. requires a facility permit for their battery breaking/smelting operation and either a permit or variance to receive the duPont flue dust for recycling. If you have any further questions, please contact Tim Potter at ATSS 8-492-3670. I have enclosed a photocopy of Lake Engineering's letters of May 12 and July 14, 1986, so that your records will be complete.

RMc:rmn

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET

SANTA MONTE, CA 95814

() 323-6043

EXEMPTION/VARIANCE FILE



March 22, 1982

Mr. Douglas Weber
Environmental Coordinator
Gould Inc., Metals Division (GWB Incorporated)
2700 South Indiana Street
Los Angeles, CA 90023



Dear Mr. Weber:

On February 2, 1982, you requested that the California State Department of Health Services (DOHS) rescind Interim Status Document (ISD) No. CAD097854541, issued for your company's Los Angeles facility. You made the following statements (paraphrased here) in support of your request:

- The only hazardous waste that your company produces is secondary lead smelter baghouse dust.
- Your company is installing a new smelter which will recycle the baghouse dust such that the hazardous waste will no longer be stored at your facility for more than 60 days.
- You will notify us in writing when the new smelter begins operation.

Please be advised that the DOHS has reviewed your request and has made the following determinations:

- We will rescind your ISD effective on the date of receipt of written notification that the new smelter has begun operation.
- Although we have rescinded your ISD, your company will still be a producer of hazardous wastes and as such has the responsibility of handling those wastes properly (e.g., use of the manifest, use of a registered hazardous waste hauler, etc.).

If you have questions concerning this letter, please write or call.

Sincerely,

William F. Jopling, Acting Chief
Permits, Surveillance and
Enforcement Section
Hazardous Waste Management Branch

NR

GOULD

February 2, 1982

Letter sent.


Department of Health Services
Hazardous Materials Management Section
714/744 P Street
Sacramento, CA 95814

Dear Mr. Workman:

The Gould Inc., Metals Division facility in Los Angeles will be terminating the temporary storage of hazardous wastes on site. We had filed as a TSD facility solely because we kept secondary lead smelter baghouse dust (K069) over 60 days before recycling it back into the furnaces. We are currently in the shakedown activity for our new smelter. It will continuously recycle any baghouse dust with no storage. We do not desire any classification as a TSD facility. We are only a generator and plan to remain in that sole classification. For these reasons we request that you recind the interim status document # CAD097854541 of December 18, 1981 which you issued to Gould. We will send you notification of the start up of our new facility when it is operational.

If you have any questions, please feel free to call.

Respectfully,


Douglas Weber
Environmental Coordinator

DW:mlf

cc: William Wilson
U.S. Environmental Protection Agency
Region IX
215 Freemont Street
San Francisco, CA 94105

2004 1982

LAKE ENGINEERING, INC.

6000 LAKE FORREST DRIVE
SUITE 350
ATLANTA, GEORGIA 30328

November 5, 1988

U. S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105
Attn: T-2-2

Re: GNB INCORPORATED, CAD097854541

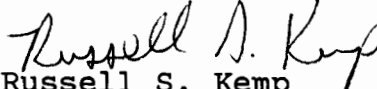
Dear Sirs:

Enclosed is a copy of Enclosure A "Information Regarding Potential Releases from Solid Waste Management Units" for GNB, INC. in Vernon California. Also enclosed is a copy of the letter of transmittal which accompanied the facility's Part B Permit Application to the California Department of Health Services.

Both of these documents were submitted to the State before the November 8, 1988 deadline.

Sincerely,

LAKE ENGINEERING, INC.


Russell S. Kemp
Project Engineer

RSK:kdf

Enclosures

cc: Mr. Kenneth G. Clark
Tech. & Envir. Manager
GNB Incorporated

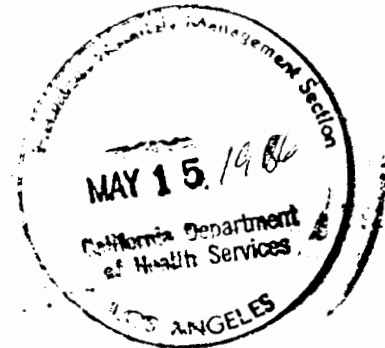
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LAKE ENGINEERING AND DEVELOPMENT, INC.

6000 LAKE FORREST DRIVE
SUITE 350
ATLANTA, GEORGIA 30328
TELEPHONE: (404) 257-9634

May 12, 1986

Mr. Gautam Guha
California Department of Health Services
Toxic Substance Control Division
107 South Broadway - Room 7011
Los Angeles, CA 90012



Dear Mr. Guha:

Lake Engineering and Development, Inc. has been retained by GNB Incorporated to advise and assist them in obtaining the required permit documents, if any, for receipt and storage of raw materials at their secondary lead smelter in Vernon, California. The smelter has the capacity to produce approximately 72,000 tons per year of refined lead alloys from lead bearing scrap materials. These scrap materials consist primarily of spent lead-acid batteries, scrap from battery manufacturing plants and scrap or by-products from other manufacturers of lead products. The Vernon smelter provides a valuable environmental service in that it can reclaim 72,000 tons of lead per year that may otherwise have been disposed of in the environment.

Some degree of confusion has existed since the effective date of the RCRA Regulations, and of course the corresponding California regulations, over the regulatory status of this facility. Perhaps a short summary of the recent history of the plant will serve to clarify the issue.

According to the information I have, the original smelter at the location began in the 1940's or earlier and was known as Morris P. Kirk and Sons. It was subsequently purchased by ~~National Lead Company (which became NL Industries, Inc.)~~ who ran the plant until it was purchased by Gould, Inc. in 1979. Gould, Inc. almost immediately began a major reconstruction of the smelter, investing over \$40 million to build the most modern state-of-the-art secondary lead smelter in the United States. In 1984, Gould, Inc. "spun off" its battery manufacturing and metals operations to a group of management personnel and the new company was named GNB Incorporated. This company presently operates the smelter.

The processes employed by the new state-of-the-art smelter constructed by Gould, Inc. are, in some ways, unique in the secondary lead industry. Lead bearing scrap, primarily spent lead acid batteries, is fed directly into a proprietary process called the RMPS (raw material preparation system). There, components of the scrap are segregated and prepared for

Mr. Guha
May 12, 1986
Page Two

additional processing in the plant's reverberatory and blast furnaces. Polypropylene plastic is reclaimed in this process for sale as raw material to secondary plastic resin manufacturers. Flue dust (K069) generated by the smelting operations is fed directly back into the RMPS system by enclosed screw conveyors, thereby never leaving the production process. Hazardous wastes generated by the process, namely hard rubber chips from the casing material of some spent batteries and blast furnace slag are disposed of off-site at a secure hazardous waste landfill. Incidentally, a research and development project is currently underway to investigate ways to further process the hard rubber chips and to find a viable market for them as part of GNB Incorporated's waste minimization efforts.

Questions have existed since the effective date of RCRA as to whether the plant would require a TSDF or Resource Recovery Permit. The following is a brief summary of actions taken and correspondence regarding that question as we understand it.

<u>DATE</u>	<u>ACTION</u>
Nov. 19, 1980	Gould submits a "Part A" application to EPA indicating that the plant treats 5300 tons per year of sulfuric acid electrolyte (D002) in tanks capable of treating 10,000 gallons per day and stores 7300 tons per year of emission control dust (K069) in a 260 cubic yard waste pile. EPA later promulgates the "wastewater treatment rule" which apparently exempts the electrolyte treatment in tanks from RCRA regulation. The waste storage pile was a regulated unit and was properly reported.
Dec. 18, 1981	California issues an Interim Status Document to Gould, Inc.
Feb. 2, 1982	Gould, Inc. requests that California rescind the Interim Status Document due to the fact that, when completed, the new process will directly reprocess the K069, eliminating the need for the storage pile.
Feb. 18, 1982	EPA rescinds TSDF classification by returning the original Part A and by stating the plant has no "regulated units".

Mr. Guha
May 12, 1986
Page Three

Mar. 22, 1982 DOHS informs Gould, Inc. that the ISD will be rescinded upon receiving notification of new plant startup.

Dec. 3, 1982 Gould, Inc. notifies DOHS that the new plant has started.

Apparently no formal notification was ever received by Gould, Inc. (or subsequently GNB Incorporated) that the ISD had been rescinded.

This history brings us to the question at hand today. GNB Incorporated has entered into a tentative agreement with E.I. du Pont de Nemours and Company's Chambers Works, Deepwater, New Jersey, to process emission control dust (K069) generated by du Pont through GNB Incorporated's production process in Vernon to produce lead. This material is virtually identical to the emission control dust generated by GNB Incorporated which is directly recycled in its process. Upon receipt, the material will be directly fed to the RMPS process and serves as a feed material for the smelting furnaces. du Pont does not have a RMPS type process and is incapable of reprocessing the material.

The material will be transported from Deepwater, New Jersey, by railcar inside plastic lined gaylord box containers. The boxes would be individually labeled, marked, and accompanied by a Uniform Hazardous Waste Manifest in accordance with Hazardous Waste Transportation Requirements. "Storage" at GNB Incorporated would only be incidental to unloading the gaylord boxes from the railcar and then emptying the boxes into the RMPS process. The process does not constitute "treatment" since it is clearly an integral part of GNB Incorporated's production process. Since it has been determined that GNB Incorporated's current operations are likely not defined as "TSD", some method must be devised to properly complete the Hazardous Waste Manifests which will accompany the du Pont material.

As a solution to this question we would like to recommend the following procedure which we believe satisfies the intent of the California Environmental Health Regulations and New Jersey and Federal requirements. GNB Incorporated is now subject to §66822 - Management of Spent Lead Acid Storage Batteries. This regulation requires GNB Incorporated to accept and keep a record of either a Hazardous Waste Manifest or a bill of lading for each load of spent lead acid batteries it purchases and receives. Further, the regulation requires GNB Incorporated to submit an annual report summarizing for the previous calendar year

Mr. Guha
May 12, 1986
Page Four

information including, but not limited to, the name of the generator and the transporter of the batteries. We suggest, that along with this annual report, GNB Incorporated submit or include information on the material received from du Pont as well. This would be in keeping with the spirit of §66822 which allows DOHS to keep track of these types of materials and their ultimate reclamation or fate. If you concur with this recommendation we would appreciate a letter from your office so indicating. That letter would allow GNB Incorporated to inform du Pont that it has the necessary approval to accept the material and shipments could begin.

In October 1985, GNB Incorporated discussed the Vernon plant reclamation activities with Mr. Michael Feeley, Chief, RCRA Program Section of the US EPA Region IX and his staff. On January 30, 1986, Mr. Feeley responded with a determination that its Vernon facility is not considered a storage facility and not subject to requirements listed in §266.80(b).

Our investigation of the California regulations concludes that GNB Incorporated is not subject to permitting requirements at this time for the following reasons. All raw materials purchased by the plant for its production process are exempt, it appears, from the requirements associated with "recyclable materials" by Section 25143.2(b)(5) of the California Health and Safety Code. That paragraph states that a "recyclable material" is exempt from regulation if it ..."(5) Is both transported and used, or reused as an ingredient in an industrial process to make a product, provided that material is not being treated before that use or reuse." GNB Incorporated would appreciate your concurrence with the EPA regarding the fact that there is no need to apply for and obtain a Resource Recovery Permit.

We appreciate your consideration of these matters. Please call us if you have any question at this time.

Sincerely,

LAKE ENGINEERING & DEVELOPMENT, INC.



Michael L. Sappington, P.E.
President

MLS:sas

LAW OFFICES
BRIGGS AND MORGAN
PROFESSIONAL ASSOCIATION

2200 FIRST NATIONAL BANK BUILDING
SAINT PAUL, MINNESOTA 55101

TELEPHONE (612) 291-1215

TELECOPIER (612) 222-4071

INCLUDING THE FORMER FIRM OF
LEVITT, PALMER, BOWEN, ROTMAN & SHARE

MATTHEW J. LEVITT
COLE OEHLE
ROBERT M. BOWEN
A. LAURENCE DAVIS
FRANK HAMMOND
LEONARD J. KEYES
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MCNEIL V. SEYMOUR, JR.
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ROBERT E. WOODS
ROBYN L. HANSEN
WILLIAM J. JOANIS
MARGARET K. SAVAGE
BRIAN G. BELLISLE
TONY STEMBERGER
MARY SCHAFFNER EVINGER
MICHAEL H. STREATER

JOHN H. LINDSTROM
RICHARD D. ANDERSON
SALLY A. SCOGGIN
DAVID C. McDONALD
BRUCE W. MOOTY
VIRGINIA A. DWYER
ERIC NILSSON
ANDREW R. KINTZINGER
FREDERICK P. ANGST
ROBERT L. LEE
TRUDY R. GASTRAZORO
ELIZABETH J. ANDREWS
GREGORY J. STENMOE
CHARLES B. ROGERS
TERRY L. SLYE
MARY M. DYRSETH
KEVIN A. BERG

OF COUNSEL
J. NEIL MORTON
RICHARD E. KYLE
JOHN M. PALMER
SAMUEL H. MORGAN
FRANK N. GRAHAM

March 30, 1984

U. S. EPA, Region IX
215 Freemont Street
San Francisco, CA 84105

Gentlemen:

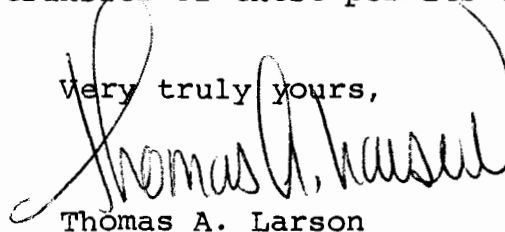
I have been requested by Gould Inc., 10 Gould Center, Rolling Meadows, Illinois 60008 and GNB Batteries, Inc., 1110 Highway 110, Mendota Heights, Minnesota 55118 to advise your office of the following.

GNB Batteries, Inc. became a wholly-owned subsidiary of Gould Inc. in 1983. In the near future, GNB Batteries, Inc. will become an independent company.

This represents a change in ownership only, with current management remaining in place as the new owners. Facility locations, operations, processes and permit conditions will remain unchanged.

Our purpose in writing is to notify your office of this ownership change in relation to the permits on the second page of this letter. Please advise us of any other procedural requirements necessary to complete the transfer of these permits to GNB Batteries, Inc.

Very truly yours,



Thomas A. Larson

TAL:sg
enclosure

PLANT: Los Angeles, CA
ACTIVITY: Hazardous Waste (RCRA)
AGENCY: U.S. EPA Region IX
215 Freemont Street
San Francisco, CA 94105

AGENCY CONTACT:

PERMIT INFORMATION:

Name:

Issued: Permit applied for

Expires:

Permit # CAD097854541

PLANT: City of Industry, CA
ACTIVITY: Hazardous Wastes (RCRA)
AGENCY: Federal: U.S. EPA Region IX
215 Fremont Street
San Francisco, CA 94105
State: California Board of Equalization
1020 N Street
Box 1799
Sacramento, CA 95805 916-445-4272

AGENCY CONTACT:

PERMIT INFORMATION:

Federal: ID #CAD008324832
Application: November 18, 1980
By: Gould Inc.

- State:
- (1) "Application for Registration as Operator of Hazardous Waste Facility"
Submitted November 12, 1981
 - (2) "Application for Registration Under Hazardous Substance Tax Law"
Submitted December 18, 1981

RESPONDENT CONTACT RECORD

FACILITY ID NUMBER

CAD 097854541

COMPANY NAME

Goalo Inc Metals Dis

COMPANY ADDRESS

2700 S Indiana St

CITY

STATE

ZIP CODE

CONTACT PERSON'S NAME/TITLE

TELEPHONE NUMBER

(213) 262-1101

CONTACT RECORD

DATE

CONTRACTOR'S
INITIALS'

ITEMS DISCUSSED/RESOLUTION

12-6-83

MR

Met Bandini + 26th

Lat 34 00 25 Long 118 11 35